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USCIS-2018-0001-0001	Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications	PROPOSED RULES	Notice of Proposed Rulemaking (NPRM)	Posted	09/09/2019	84 FR 47148
USCIS-2018-0001-2745	Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I- 765 Employment Authorization Applications	RULES	Final Rule	Posted	06/22/2020	85 FR 37502

# Proposed Rules

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This section of the FEDERAL REGISTER contains notices to the public of the proposed issuance of rules and regulations. The purpose of these notices is to give interested persons an opportunity to participate in the rule making prior to the adoption of the final rules.

## DEPARTMENT OF HOMELAND SECURITY

### 8 CFR Part 208

[CIS No. 2617–18; DHS Docket No. USCIS–2018–0001]

RIN 1615–AC19

### Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I–765 Employment Authorization Applications

**AGENCY:** U.S. Citizenship and Immigration Services, DHS.

**ACTION:** Notice of proposed rulemaking.

**SUMMARY:** The Department of Homeland Security (DHS) proposes to remove a regulatory provision stating that U.S. Citizenship and Immigration Services (USCIS) has 30 days from the date an asylum applicant files the initial Form I–765, Application for Employment Authorization (EAD application) to grant or deny that initial employment authorization application. DHS also proposes to remove the provision requiring that the application for renewal must be received by USCIS 90 days prior to the expiration of the employment authorization.

**DATES:** Written comments and related material must be submitted on or before November 8, 2019.

**ADDRESSES:** You may submit comments on the entirety of this proposed rule package, to include any proposed information collection requirements, which is identified as DHS Docket No. USCIS–2018–0001, by any *one* of the following methods:

*Federal eRulemaking Portal (preferred):* <http://www.regulations.gov>. Follow the website instructions for submitting comments.

*Mail:* Samantha Deshommes, Chief, Regulatory Coordination Division, Office of Policy and Strategy, U.S. Citizenship and Immigration Services, Department of Homeland Security, 20 Massachusetts Avenue NW, Mailstop #2140, Washington, DC 20529–2140. To ensure proper handling, please

reference DHS Docket No. USCIS–2018–0001 in your correspondence. Mail must be postmarked by the comment submission deadline. Please note that USCIS cannot accept any comments that are hand delivered or couriered. In addition, USCIS cannot accept mailed comments contained on any form of digital media storage devices, such as CDs/DVDs and USB drives.

#### FOR FURTHER INFORMATION CONTACT:

Daniel Kane, Branch Chief, Service Center Operations, U.S. Citizenship and Immigration Services (USCIS), DHS, 20 Massachusetts NW, Washington, DC 20529–2140; telephone: 202–272–8377.

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BCU Background Check Unit  
 CFDO Center Fraud Detection Operations  
 CFR Code of Federal Regulations  
 DHS Department of Homeland Security  
 EAD Employment Authorization Document  
 INA Immigration and Nationality Act  
 HSA Homeland Security Act of 2002  
 USCIS U.S. Citizenship and Immigration Services

#### I. Public Participation

DHS invites all interested parties to participate in this rulemaking by submitting written data, views, comments, and arguments on all aspects of this proposed rule. DHS also invites comments that relate to the economic, environmental, or federalism effects that might result from this proposed rule. Comments must be submitted in English, or an English translation must be provided. Comments that will provide the most assistance to USCIS in implementing these changes will reference a specific portion of the proposed rule, explain the reason for any recommended change, and include data, information, or authority that supports such recommended changes.

*Instructions:* If you submit a comment, you must include the agency name (U.S. Citizenship and Immigration Services) and the DHS Docket No. USCIS–2018–0001 for this rulemaking. Please note that DHS is also pursuing a separate rulemaking entitled “Asylum Application, Interview, and Employment Authorization for Applicants,” RIN 1615–AC27, DHS Docket No. USCIS–2019–0011 (“broader asylum EAD NPRM”), separate from this NPRM. The two rulemakings include distinct proposals. For this proposed rule, DHS will only consider comments submitted to Docket No. USCIS–2018–0001. Please ensure that you submit your comments to the correct docket.

Regardless of the method used for submitting comments or material, all submissions will be posted, without change, to the Federal eRulemaking Portal at <http://www.regulations.gov>, and they will include any personal information you provide. Therefore, submitting this information makes it public. You may wish to consider limiting the amount of personal information that you provide in any voluntary public comment submission that you make to DHS. DHS may

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withhold information provided in comments from public viewing if it determines that it may impact the privacy of an individual or is offensive. For additional information, please read the Privacy and Security Notice, which is available at <http://www.regulations.gov>.

**Docket:** For access to the docket and to read background documents or comments received, go to <http://www.regulations.gov>, referencing DHS Docket No. USCIS-2018-0001. You may also sign up for email alerts on the online docket to be notified when comments are posted or a final rule is published.

## II. Executive Summary

### A. Purpose of the Regulatory Action

DHS is proposing to eliminate the regulation articulating a 30-day processing timeframe for USCIS to adjudicate initial Applications for Employment Authorization (Forms I-765 or EAD applications) for asylum applicants. This change is intended to ensure USCIS has sufficient time to receive, screen, and process applications for an initial grant of employment authorization based on a pending asylum application. This change will also reduce opportunities for fraud and protect the security-related processes undertaken for each EAD application. DHS is also proposing to remove the provision requiring that the application for renewal must be received by USCIS 90 days prior to the expiration of their employment authorization. This change is intended to align existing regulatory text with DHS policies implemented under the *Retention of EB-1, EB-2, and EB-3 Immigrant Workers and Program Improvements Affecting High-Skilled Nonimmigrant Workers* final rule, 82 FR 82398, 82457 (2017 AC21 Rule), which became effective January 17, 2017.

### B. Legal Authority

The authority of the Secretary of Homeland Security (Secretary) for these regulatory amendments is found in various sections of the Immigration and Nationality Act (INA), 8 U.S.C. 1101 *et seq.*, and the Homeland Security Act of 2002 (HSA), Public Law 107-296, 116 Stat. 2135, 6 U.S.C. 101 *et seq.* General authority for issuing the proposed rule is found in section 103(a) of the INA, 8 U.S.C. 1103(a), which authorizes the Secretary to administer and enforce the immigration and nationality laws and to establish such regulations as she deems necessary for carrying out such authority. Further authority for the regulatory amendment in the final rule

is found in section 208(d)(2) of the INA, 8 U.S.C. 1158(d)(2), which states an applicant for asylum is not entitled to employment authorization, and may not be granted asylum application-based employment authorization prior to 180 days after filing of the application for asylum, but otherwise authorizes the Secretary to prescribe by regulation the terms and conditions of employment authorization for asylum applicants.

### C. Costs and Benefits

DHS proposes to remove the requirement to adjudicate initial EAD applications for pending asylum applicants within 30 days. In FY 2017, prior to the *Rosario v. USCIS* court order, the adjudication processing times for initial Form I-765 under the Pending Asylum Applicant category exceeded the regulatory set timeframe of 30 days more than half the time. However, USCIS adjudicated approximately 78 percent of applications within 60 days. In response to the *Rosario v. USCIS* litigation and to comply with the court order, USCIS has dedicated as many resources as practicable to these adjudications, but continues to face a historic asylum application backlog, which in turn increases the numbers of applicants eligible for pending asylum EADs. However, USCIS does not want to continue this reallocation of resources as a long-term solution because it removes resources from other competing work priorities in other product lines and adds delays to other time-sensitive adjudication timeframes. USCIS could hire more officers, but has not estimated the costs of this and therefore has not estimated the hiring costs that might be avoided if this proposed rule were adopted. Hiring more officers would not immediately and in all cases shorten adjudication timeframes because (1) additional time would be required to onboard and train new employees, and (2) for certain applications, additional time is needed to fully vet an applicant, regardless of staffing levels.

In addition, USCIS has also not estimated the cost impacts that hiring additional officers could have on the agency's form fees. There is currently no fee for asylum applications or the corresponding initial EAD applications,<sup>1</sup> and the cost to the agency

for adjudication is covered by fees paid by other benefit requesters. USCIS is not certain of the actual cost impacts of hiring additional adjudicators to process these EAD applications at this time. USCIS expects that potentially higher fees might be avoidable if the proposed rule is adopted. As a primary goal, USCIS seeks to adequately vet applicants and adjudicate applications as quickly and efficiently as possible. This proposed rule may delay the ability for some initial applicants whose EAD processing is delayed beyond the 30-day regulatory timeframe to work.

The impacts of this rule are measured against a baseline. This baseline is the best assessment of the way the world would look absent this proposed action. For this proposed action, USCIS assumes that in the absence of this proposed rule the baseline amount of time that USCIS would take to adjudicate would be 30 days. USCIS also assumes that if this proposed rule is adopted, adjudications will align with DHS processing times achieved in FY 2017 (before the *Rosario v. USCIS* court order). This is our best estimate of what would occur if the proposed rule is adopted. USCIS believes the FY 2017 timeframes are sustainable and USCIS intends to meet these timeframes if the proposed rule is adopted. Therefore, USCIS is analyzing the impacts of this rule by comparing the costs and benefits of adjudicating initial EAD applications for pending asylum applications within 30 days compared to the actual time it took to adjudicate these EAD applications in FY 2017.

The impacts of this rule would include both distributional effects (which are transfers) and costs.<sup>2</sup> The distributional impacts would fall on the asylum applicants who would be delayed in entering the U.S. labor force. The distributional impacts (transfers) would be in the form of lost compensation (wages and benefits). A portion of this lost compensation might be transferred from asylum applicants to others that are currently in the U.S.

Security and Restore Integrity to Our Immigration System (Apr. 29, 2019), available at <https://www.whitehouse.gov/presidential-actions/presidential-memorandum-additional-measures-enhance-border-security-restore-integrity-immigration-system/> (last visited June 26, 2019). The implementation of the President's directive would take place via a separate rulemaking, but it is uncertain whether it would reduce the overall resource burden associated with the 30-day adjudication timeframe.

<sup>2</sup> Transfer payments are monetary payments from one group to another that do not affect total resources available to society. See OMB Circular A-4 pages 14 and 38 for further discussion of transfer payments and distributional effects. Circular A-4 is available at: <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A4/a-4.pdf>.

<sup>1</sup> On April 29, 2019, President Trump directed DHS to propose regulations that would set a fee for an asylum application not to exceed the costs of adjudicating the application, as authorized by section 208(d)(3) of the INA (8 U.S.C. 1158(d)(3)) and other applicable statutes, and would set a fee for an initial application for employment authorization for the period an asylum claim is pending. See Presidential Memorandum for the Attorney General and Secretary of Homeland Security on Additional Measures to Enhance Border



labor force, possibly in the form of additional work hours or overtime pay. A portion of the impacts of this rule would also be borne by companies that would have hired the asylum applicants had they been in the labor market earlier but were unable to find available workers. These companies would incur a cost, as they would be losing the productivity and potential profits the asylum applicant would have provided had the asylum applicant been in the labor force earlier. Companies may also incur opportunity costs by having to choose the next best alternative to immediately filling the job the asylum applicant would have filled. USCIS does not know what this next best alternative may be for those companies. As a result, USCIS does not know the portion of overall impacts of this rule that are transfers or costs. If companies can find replacement labor for the position the asylum applicant would have filled, this rule would have primarily distributional effects in the form of transfers from asylum applicants to others already in the labor market (or workers induced to return to the labor market). USCIS acknowledges that there may be additional opportunity costs to employers such as additional search costs. However, if companies cannot find reasonable substitutes for the labor the asylum applicants would have provided, this rule would primarily be a cost to these companies through lost productivity and profits. USCIS uses the lost compensation to asylum applicants as a measure of the overall impact of the rule—either as distributional impacts (transfers) or as a proxy for businesses' cost for lost productivity. It does not include additional costs to businesses for lost profits and opportunity costs or the distributional impacts for those in an applicant's support network.

The lost compensation to asylum applicants could range from \$255.88 million to \$774.76 million annually depending on the wages the asylum applicant would have earned. The ten-year total discounted lost compensation to asylum applicants at 3 percent could range from \$2,182.68 million to \$6,608.90 million and at 7 percent could range from \$1,797.17 million to \$5,441.62 million (years 2019–2028). USCIS recognizes that the impacts of this proposed rule could be overstated if the provisions in the broader asylum EAD NPRM are finalized as proposed. Specifically, the broader asylum EAD NPRM would limit or delay eligibility for employment authorization for certain asylum applicants.<sup>3</sup>

<sup>3</sup> Among other proposed changes, the broader asylum EAD NPRM would implement a

Accordingly, if the population of aliens is less than estimated as a result of the broader asylum EAD rule, the estimated impacts of this rule could be overstated because the population affected may be lower than estimated in this rule.

In instances where a company cannot hire replacement labor for the position the asylum applicant would have filled, USCIS acknowledges that such delays may result in tax losses to the government. It is difficult to quantify income tax losses because individual tax situations vary widely<sup>4</sup> but USCIS estimates the potential loss to other employment tax programs, namely Medicare and social security which have a combined tax rate of 7.65 percent (6.2 percent and 1.45 percent, respectively).<sup>5</sup> With both the employee and employer not paying their respective portion of Medicare and social security taxes, the total estimated tax loss for Medicare and social security is 15.3 percent.<sup>6</sup> Lost wages ranging from \$255.88 million to \$774.76 million would result in employment tax losses to the government ranging from \$39.15

Presidential directive related to employment authorization for asylum applicants. On April 29, 2019, President Trump directed DHS to propose regulations that would bar aliens who have entered or attempted to enter the United States unlawfully from receiving employment authorization before any applicable application for relief or protection from removal has been granted, and to ensure immediate revocation of employment authorization for aliens who are denied asylum or become subject to a final order of removal. See Presidential Memorandum for the Attorney General and Secretary of Homeland Security on Additional Measures to Enhance Border Security and Restore Integrity to Our Immigration System (Apr. 29, 2019), available at <https://www.whitehouse.gov/presidential-actions/presidential-memorandum-additional-measures-enhance-border-security-restore-integrity-immigration-system/> (last visited June 26, 2019). See also Unified Agenda of Regulatory and Deregulatory Actions, RIN 1615–AC27 (Spring 2019), available at <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=201904&RIN=1615-AC27> (last visited Aug. 7, 2019) (“The Department of Homeland Security (DHS) plans to propose regulatory amendments intended to promote greater accountability in the application process for requesting employment authorization and to deter the fraudulent filing of asylum applications for the purpose of obtaining Employment Authorization Documents (EADs).”).

<sup>4</sup> See More than 44 percent of Americans pay no federal income tax (September 16, 2018) available at <https://www.marketwatch.com/story/81-million-americans-wont-pay-any-federal-income-taxes-this-year-heres-why-2018-04-16>.

<sup>5</sup> The various employment taxes are discussed in more detail at <https://www.irs.gov/businesses/small-businesses-self-employed/understanding-employment-taxes>. See IRS Publication 15, Circular E, Employer's Tax Guide for specific information on employment tax rates. [https://www.irs.gov/pub/irs-pdf/p15\\_18.pdf](https://www.irs.gov/pub/irs-pdf/p15_18.pdf).

<sup>6</sup> Calculation: (6.2 percent social security + 1.45 percent Medicare) × 2 employee and employer losses = 15.3 percent total estimated tax loss to government.

million to \$118.54 million.<sup>7</sup> Again, depending on the circumstances of the employee, there could be additional federal income tax losses not estimated here. There may also be state and local income tax losses that would vary according to the jurisdiction.

This proposed rule would result in reduced opportunity costs to the Federal Government. Since *Rosario* compelled USCIS to comply with the 30-day provision in FY 2018, USCIS has redistributed its adjudication resources to work up to full compliance. If the 30-day timeframe is removed, these redistributed resources could be reallocated, potentially reducing delays in processing of other applications, and avoiding costs associated with hiring additional employees. USCIS has not estimated these avoided costs. Additionally, USCIS does not anticipate that removing the separate 90-day EAD filing requirement would result in any costs to the Federal Government.

The proposed rule would benefit USCIS by allowing it to operate under long-term, sustainable case processing times for initial EAD applications for pending asylum applicants, to allow sufficient time to address national security and fraud concerns, and to maintain technological advances in document production and identity verification. Applicants would rely on up-to-date processing times, which provide accurate expectations of adjudication times.

The proposed technical change to remove the 90-day filing requirement would reduce confusion regarding EAD renewal requirements for pending asylum applicants and ensure the regulatory text reflects current DHS policy and regulations under DHS's final 2017 AC21 Rule.<sup>8</sup>

<sup>7</sup> Calculations: Lower bound lost wages \$255.88 million × 15.3 percent estimated tax rate = \$39.15 million.

Upper bound lost wages \$774.76 million × 15.3 percent estimated tax rate = \$118.54 million.

<sup>8</sup> In the 2017 AC21 final rule, 81 FR 82398, USCIS amended 8 CFR 274a.13 to allow for the automatic extension of existing, valid EADs for up to 180 days for renewal applicants falling within certain EAD categories as described in the regulation and designated on the USCIS website. See 8 CFR 274a.13(d). Among those categories is asylum applicants. To benefit from the automatic extension, an applicant falling within an eligible category must (1) properly file his or her renewal request for employment authorization before its expiration date, (2) request renewal based on the same employment authorization category under which the expiring EAD was granted, and (3) will continue to be authorized for employment based on his or her status, even after the EAD expires and is applying for renewal under a category that does not first require USCIS to adjudicate an underlying application, petition, or request.



Table 1 provides a detailed summary of the regulatory changes and the expected impacts of this proposed rule.

TABLE 1—SUMMARY OF PROPOSED PROVISIONS AND IMPACTS

Current provision	Proposed change to provision	Expected costs and transfers from proposed provision	Expected benefits from proposed provision
USCIS has a 30-day EAD adjudication timeframe for applicants who have pending asylum applications.	USCIS proposes to eliminate the provisions for the 30-day adjudication timeframe and issuance of EADs for pending asylum applicants.	<p><i>Quantitative:</i></p> <p>This provision could delay the ability of some initial applicants to work. A portion of the impacts of the rule would be the lost compensation transferred from asylum applicants to others currently in the workforce, possibly in the form of additional work hours or overtime pay. A portion of the impacts of the rule would be lost productivity costs to companies that would have hired asylum applicants had they been in the labor market, but who were unable to find available workers. USCIS uses the lost compensation to asylum applicants as a measure of these distributional impacts (transfers) and as a proxy for businesses' cost for lost productivity. The lost compensation due to processing delays could range from \$255.88 million to \$774.76 million annually. The total ten-year discounted lost compensation for years 2019–2028 averages \$4,395.79 million and \$3,619.40 million at discount rates of 3 and 7 percent, respectively. USCIS does not know the portion of overall impacts of this rule that are transfers or costs. Lost wages ranging from \$255.88 million to \$774.76 million would result in employment tax losses to the government ranging from \$39.15 million to \$118.54 million.</p> <p><i>Qualitative:</i></p> <p>There may also be additional distributional impacts for those in an applicant's support network—if applicants are unable to work legally, they may need to rely on resources from family members, friends, non-profits, or government entities for support.</p>	<p><i>Quantitative:</i></p> <p>Not estimated.</p> <p><i>Qualitative:</i></p> <p>DHS would be able to operate under long-term sustainable case processing times for initial EAD applications for pending asylum applicants, to allow sufficient time to address national security and fraud concerns, and to maintain technological advances in document production and identity verification without having to add any resources.</p> <p>This rule would result in reduced opportunity costs to the Federal Government. If the 30-day timeframe is removed, USCIS could reallocate the resources it redistributed to comply with the 30-day provision, potentially reducing delays in processing of other applications and avoiding costs associated with hiring additional employees.</p>
Applicants can currently submit a renewal EAD application 90 days before the expiration of their current EAD.	USCIS proposes to remove the 90-day submission requirement for renewal EAD applications.	<p><i>Quantitative:</i></p> <p>None.</p> <p><i>Qualitative:</i></p> <p>None.</p>	<p><i>Quantitative:</i></p> <p>None.</p> <p><i>Qualitative:</i></p> <p>Applicants— Reduces confusion regarding EAD renewal requirements. Some confusion may nonetheless remain if applicants consult outdated versions of regulations or inapplicable DOJ regulations.</p> <p>DHS/USCIS— The DHS regulations would be updated to match those of other EAD categories.</p>

As previously discussed, USCIS does not know the portion of overall impacts of this rule that are transfers or costs, but estimates that the maximum monetized impact of this rule from lost compensation is \$774.76 million annually. If all companies are able to easily find reasonable labor substitutes for the positions the asylum applicant would have filled, they will bear little

or no costs, so \$774.76 million will be transferred from asylum applicants to workers currently in the labor force or induced back into the labor force (we assume no tax losses as a labor substitute was found). Conversely, if companies are unable to find reasonable labor substitutes for the position the asylum applicant would have filled then \$774.76 million is the estimated

maximum monetized cost of the rule and \$0 is the estimated minimum in monetized transfers from asylum applicants to other workers. In addition, under this scenario, because the jobs would go unfilled there would be a loss of employment taxes to the Federal Government. USCIS estimates \$118.54 million as the maximum decrease in employment tax transfers from

companies and employees to the Federal Government. The two scenarios described above represent the estimated endpoints for the range of monetized impacts resulting from this rule, and are summarized in Table 2 below.

TABLE 2—SUMMARY OF RANGE OF MONETIZED ANNUAL IMPACTS

Category	Description	Scenario: No replacement labor found for asylum applicants		Scenario: All asylum applicants replaced with other workers		Primary (half of the highest high for each row)
		Low wage	High wage	Low wage	High wage	
Cost .....	Lost compensation used as proxy for lost productivity to companies.	\$255.88	\$774.76	\$0.00	\$0.00	\$387.38
Transfer .....	Compensation transferred from asylum applicants to other workers.	0.00	0.00	255.88	774.76	387.38
Transfer .....	Lost employment taxes paid to the Federal Government ....	39.15	118.54	0.00	0.00	59.27

As required by OMB Circular A–4, Table 3 presents the prepared A–4 accounting statement showing the costs and transfers associated with this proposed regulation. For the purposes of the A–4 accounting statement below, USCIS uses the mid-point as the primary estimate for both costs and

transfers because the total monetized impact of the rule from lost compensation cannot exceed \$774.76 million and as described, USCIS is unable to apportion the impacts between costs and transfers. Likewise, USCIS uses a mid-point for the reduction in employment tax transfers

from companies and employees to the Federal Government when companies are unable to easily find replacement workers. USCIS notes that there may be some unmonetized costs such as additional opportunity costs to employers that would not be captured in these monetized estimates.

TABLE 3—OMB A–4 ACCOUNTING STATEMENT (\$ MILLIONS, 2017)

[Period of analysis: 2019–2028]

Category	Primary estimate		Minimum estimate	Maximum estimate	Source citation (RIA, preamble, etc.)
Benefits					
Monetized Benefits .....	(7%) (3%)	N/A N/A	N/A N/A	N/A N/A	RIA.
Annualized quantified, but un-monetized, benefits .....	N/A		N/A	N/A	RIA.
Unquantified Benefits .....	Applicants would benefit from reduced confusion over renewal requirements. DHS would be able to operate under sustainable case processing times for initial EAD applications for pending asylum applicants, to allow sufficient time to address national security and fraud concerns, and to maintain technological advances in document production and identity verification.				RIA.
Costs					
Annualized monetized costs (discount rate in parenthesis) .....	(7%) (3%)	\$387.38 \$387.38	\$0 \$0	\$774.76 \$774.76	RIA. RIA.
Annualized quantified, but un-monetized, costs .....	N/A		N/A	N/A	RIA.
Qualitative (unquantified) costs .....	In cases where companies cannot find reasonable substitutes for the labor the asylum applicants would have provided, affected companies would also lose profits from the lost productivity. In all cases, companies would incur opportunity costs by having to choose the next best alternative to immediately filling the job the pending asylum applicant would have filled. There may be additional opportunity costs to employers such as search costs.				RIA.
Transfers					
Annualized monetized transfers: “on budget” .....	(7%) (3%)	\$0 \$0	\$0 \$0	\$0 \$0	RIA.
From whom to whom? .....	N/A				N/A.
Annualized monetized transfers: “off-budget” .....	(7%) (3%)	\$387.38 \$387.38	\$0 \$0	\$774.76 \$774.76	RIA.
From whom to whom? .....	From asylum applicants to workers in the U.S. labor force or induced into the U.S. labor force. Additional distributional impacts from asylum applicant to the asylum applicant’s support network that provides for the asylum applicant while awaiting an EAD.				RIA.
Annualized monetized transfers: “off-budget” .....	(7%) (3%)	\$59.27 \$59.27	\$0 \$0	\$118.54 \$118.54	RIA.
From whom to whom? .....	A reduction in employment taxes from companies and employees to the Federal Government. There could also be a transfer of federal, state, and local income tax revenue.				

Category	Effects	Source citation (RIA, preamble, etc.)
Effects on state, local, and/or tribal governments .....	None; no significant impacts to national labor force or to the labor force of individual states is expected. Possible loss of tax revenue.	RIA.
Effects on small businesses .....	None .....	RFA.
Effects on wages .....	None .....	RIA.
Effects on growth .....	None .....	RIA.

### III. Background and Discussion of Proposed Rule

#### *Processing of Applications for Employment Authorization Documents*

##### 1. Elimination of 30-Day Processing Timeframe

Pursuant to 8 CFR 208.7, 274a.12(c)(8), and 274a.13(a)(2), pending asylum applicants may request an EAD by filing an EAD application using Form I-765. Under current regulations at 8 CFR 208.7(a)(1), USCIS must adjudicate initial employment authorization requests under the (c)(8) category within 30 days of when the applicant files the Form I-765.<sup>9</sup> The 30-day timeframe in 8 CFR 208.7(a)(1) was established more than 20 years ago,<sup>10</sup> when the former Immigration and Naturalization Service (INS) adjudicated EAD applications at local INS offices. EAD applications are now adjudicated at USCIS Service Centers. As discussed below, DHS believes that the 30-day timeframe is outdated, does not account for the current volume of applications and no longer reflects current operational realities.<sup>11</sup> Increases in EAD

applications for pending asylum applicants have outpaced Service Center Operations resources over the last twenty years. Additionally, the level of fraud sophistication and the threat immigration-related national security concerns posed today are more complex than they were 20 years ago. Furthermore, changes in intake and document production to reduce fraud and address threats to national security, as well as necessary vetting to address such concerns, are not reflected in the current regulatory timeframe. Thus, DHS proposes to remove this provision. See proposed 8 CFR 208.7(a)(1). This change is intended to ensure USCIS has sufficient time to receive, screen, and process applications for an initial grant of employment authorization, based on a pending asylum application. This change would also reduce opportunities for fraud and protect the security-related processes undertaken for each EAD application.<sup>12</sup>

In addition, on May 22, 2015, plaintiffs in *Rosario v. USCIS*, No. C15-0813JLR (W.D. Wash.), brought a class action in the U.S. District Court for the Western District of Washington to compel USCIS to comply with the 30-day provision of 8 CFR 208.7(a)(1). On July 26, 2018, the court enjoined USCIS from further failing to adhere to the 30-day deadline for adjudicating EAD applications. USCIS is working towards compliance with the court order. Compliance with the court order places

an extraordinary strain on already strained agency resources, and USCIS will not be able to sustain such a burden in the long-term without adding additional agency resources. Thus, USCIS reiterates that it cannot sustainably meet the 30-day timeframe for the reasons outlined below, and is proposing removal of this provision.

DHS intends to grandfather into the 30-day adjudication timeframe those class members who filed their EAD applications prior to the effective date of any final rule that changes the 30-day adjudication timeline.

##### Growth of Receipts and Backlog

The growth of asylum receipts along with the growing asylum backlog has contributed to an increase in EAD applications for pending asylum applicants that has surpassed available Service Center Operations resources. As of March 12, 2018, the affirmative asylum backlog stood at 317,395 applications<sup>13</sup> and has been growing for several years. In part, this is due to a continued growth in affirmative asylum filings and historic increases in protection screenings at the border to which significant resources had to be diverted. Two main factors contributing to this backlog include: The diversion of resources away from the affirmative asylum caseload to protection screening of border arrivals, including credible fear and reasonable fear screenings, and a subsequent increase in asylum application filings, especially by Venezuelans, Central Americans, and unaccompanied alien children. For instance, credible fear screening for aliens apprehended at or near the U.S. border, see 8 CFR 208.30, increased to over 94,000 in fiscal year (FY) 2016 from 36,000 in FY 2013. Asylum applications increased to over 100,000 in FY 2017 for the first time in 20 years.<sup>14</sup> The USCIS Asylum Division

<sup>9</sup> The regulations at 8 CFR 208.7(a)(1) currently provide that if the asylum application is not denied, USCIS will have 30 days from the date of filing of the request for employment authorization to grant or deny the employment authorization request. Certain events may suspend or restart the 30-day adjudication period. For instance, the time between the issuance of a request for evidence and the receipt of the response, or a delay requested or caused by the applicant, is not counted as part of the 30-day period. 8 CFR 208.7(a)(2).

<sup>10</sup> See *Rules and Procedures for Adjudication of Applications for Asylum or Withholding of Deportation and for Employment Authorization*, 59 FR 62284 (Dec. 5, 1994); *Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures*, 62 FR 10312, 10337 (Mar. 6, 1997).

<sup>11</sup> DHS recognizes the regulatory history for originally promulgating this provision. See 62 FR at 10318 (one of the chief purposes of the deadline was “to ensure that bona fide asylees are eligible to obtain employment authorization as quickly as possible.”); *Rules and Procedures for Adjudication of Applications for Asylum or Withholding of Deportation and for Employment Authorization*, 59 FR 14779, 14780 (Mar. 30, 1994) (proposed rule) (the imposition of a 150-day waiting period before an asylum seeker may submit an initial EAD application—30 days before the 180 asylum clock runs—was done with an understanding that “[i]deally . . . few applicants would ever reach the 150-day point.”); *id.* (discussing selection of 150

days because it was a period “beyond which it would not be appropriate to deny work authorization to a person whose claim has not been adjudicated.”); see also 59 FR at 62290–91 (final rule) (weighing competing considerations, including, among other things, ensuring the availability of work authorization to legitimate applicants and limiting the burden of the employment authorization process on overall adjudication workloads); 62 FR 10337 (Mar. 6, 1997) (retaining the 30-day timeframe following enactment of the 180-day statutory waiting period). The existing 30-day timeframe has become untenable notwithstanding its humanitarian goals. However, for the reasons explained elsewhere in this preamble, DHS believes it continues to meet the goals of the underlying statutory scheme, such as by its return to processing affirmative asylum applications on a “last in, first out” (LIFO) basis.

<sup>12</sup> DHS also proposes a technical change to this paragraph and paragraph (c)(3), which would replace a reference to the former INS with a reference to USCIS.

<sup>13</sup> An affirmative asylum application filed by a principal asylum applicant may include a dependent spouse and children, who may also file their own EAD applications based on the pending asylum application.

<sup>14</sup> The USCIS Refugee, Asylum, and International Operations Parole System provided this data on March 15, 2018.



received 44,453 affirmative asylum applications in FY 2013, 56,912 in FY 2014, 84,236 in FY 2015, 115,888 in FY 2016, and 142,760 in FY 2017.<sup>15</sup> The 221.15 percent increase of affirmative asylum receipts over the span of five years has directly contributed to the increase in (c)(8) EAD receipts. USCIS received 41,021 initial EAD applications from individuals with pending asylum applications in FY 2013, 62,169 in FY 2014, 106,030 in FY 2015, 169,970 in FY 2016, and 261,782 in FY 2017. USCIS also received 37,861 renewal EAD applications from individuals with pending asylum applications in FY 2013, 47,103 in FY 2014, 72,559 in FY 2015, 128,610 in FY 2016, and 212,255 in FY 2017. The increase in both initial and renewal EAD applications coupled with the growing asylum backlog has grossly outpaced Service Center Operations resources, specifically because USCIS has had to reallocate resources from other product lines to adjudicate these EAD applications.<sup>16</sup> Thus, as demonstrated in Section IV below, the increase in both asylum applications and EAD applications for those with pending asylum applications has added to the backlog and led to a delay in adjudication times.

#### Changes in Intake and Document Production

Additionally, at the time the 30-day timeframe was established, EADs, which were formerly known as Forms I-688B, were produced by local offices that were equipped with stand-alone machines for such purposes. While decentralized card production resulted in immediate and customized adjudications for the public, the cards produced did not contain state-of-the-art security features, and they were susceptible to tampering and counterfeiting. Such deficiencies

became increasingly apparent as the United States faced new and increasing threats to national security and public safety.

In response to these concerns, the former INS and DHS made considerable efforts to upgrade application procedures and leverage technology in order to enhance integrity, security, and efficiency in all aspects of the immigration process. For example, to combat the document security problem discussed above, the former INS took steps to centralize application filing locations and card production. By 2006, DHS fully implemented these centralization efforts.<sup>17</sup>

In general, DHS now requires applicants to file Applications for Employment Authorization at a USCIS Lockbox,<sup>18</sup> which is a Post Office box used to accelerate the processing of applications by electronically capturing data and receiving and depositing fees.<sup>19</sup> If DHS ultimately approves the application, a card order is sent to a card production facility, where a tamper-resistant card reflecting the specific employment authorized category is produced and then mailed to the applicant. While the 30-day timeframe may have made sense when local offices processed applications and produced the cards, DHS believes that the intervening changes discussed above now mean that a 30-day timeframe is not reflective of current processes.

#### Fraud, Criminality, and National Security Considerations

DHS has been unable to meet the 30-day processing timeframe in certain cases due to changes to the agency's vetting procedures and increased background checks, which resulted from the Government's response to September 11, 2001 terror attacks ("9/11"). Information obtained from such checks may affect eligibility for an initial EAD based on a pending asylum

application. Specifically, the Immigration and Naturalization Service (INS), followed by U.S. Citizenship and Immigration Services (USCIS), made multiple changes to enhance the coverage of security checks, detect applicants who pose risks to national security and public safety, deter benefits fraud, and ensure that benefits are granted only to eligible applicants, in response to 9/11.

These changes included the creation of the Application Support Centers to collect applicant fingerprints, IBIS checks for all applications and FBI name check screening. In May 2004, USCIS created the Office of Fraud Detection and National Security (FDNS) to provide centralized support and policy guidance for security checks and anti-fraud operations.<sup>20</sup> In August 2004, the Homeland Security Presidential Directive (HSPD) 11, *Comprehensive Terrorist-Related Screening Procedures*,<sup>21</sup> directed DHS to

incorporate security features . . . that resist circumvention to the greatest extent possible [and consider] information individuals must present, including, as appropriate, the type of biometric identifier[s] or other form of identification or identifying information to be presented, at particular screening opportunities.

Since 9/11, USCIS implemented changes in the collection of biographic and biometric information for document production related to immigration benefits, including the Application for Employment Authorization (Form I-765). As part of the Employment Authorization benefit adjudications process since the inception of FDNS, USCIS must verify the identity of the individual applying for an EAD and determine whether any criminal, national security or fraud concerns exist. Under the current national security and fraud vetting guidelines, when an adjudicator determines that a criminal, national security and/or fraud concern exists, the case is forwarded to the Background Check Unit (BCU) or Center Fraud Detection Office (CFDO) for additional vetting.<sup>22</sup> Once the vetting

<sup>15</sup> These numbers only address the affirmative asylum applications that fall under the jurisdiction of USCIS' Asylum Division. Defensive asylum applications, filed with the Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR) are also eligible for (c)(8) EADs. There is an ongoing backlog of pending defensive asylum cases at EOIR, which as of late 2017 had approximately 650,000 cases pending. See Memorandum from Attorney General Jefferson B. Sessions III to the Executive Office for Immigration Review, *Renewing Our Commitment to the Timely and Efficient Adjudication of Immigration Cases to Serve the National Interest* (Dec. 5, 2017). The defensive asylum backlog at EOIR also contributes to an increase in both initial and renewal (c)(8) EAD applications.

<sup>16</sup> In response to the growing backlog and court-ordered requirements in *Rosario v. USCIS*, No. C15-0813/LR (W.D. Wash. July 26, 2018), Service Center Operations re-allocated available officer resources to try to meet the 30-day processing time for initial EAD applications, causing a strain across other Service Center Operations product lines.

<sup>17</sup> See USCIS Memorandum from Michael Aytes, *Elimination of Form I-688B, Employment Authorization Card* (Aug. 18, 2006). In January 1997, the former INS began issuing new, more secure EADs from a centralized location, and assigned a new form number (I-766) to distinguish it from the less secure, locally produced EADs (Forms I-688B). DHS stopped issuing Form I-688B EADs from local offices altogether in 2006.

<sup>18</sup> Asylum applicants, however, make their request for employment authorization directly on the Application for Asylum and Withholding of Removal, Form I-589, and need not file a separate Application for Employment Authorization following a grant of asylum. If they are requesting employment authorization based on their pending asylum application, they must file a separate request for employment authorization on Form I-765.

<sup>19</sup> USCIS, *Field Office FAQs* (May 2, 2013), <https://www.uscis.gov/about-us/find-uscis-office/field-offices/field-office-faqs/faq/what-lockbox>.

<sup>20</sup> In 2010, FDNS was promoted to a Directorate, which elevated the profile and brought operational improvements to this important work. See USCIS, Fraud Detection and National Security Directorate, <https://www.uscis.gov/about-us/directorates-and-program-offices/fraud-detection-and-national-security/fraud-detection-and-national-security-directorate>.

<sup>21</sup> HSPD11, *Comprehensive Terrorist-Related Screening Procedures* (Aug. 27, 2004), available at <https://fas.org/irp/offdocs/nspd/hspd-11.html>.

<sup>22</sup> USCIS conducts background checks on individuals applying for an immigration benefit because United States immigration laws and regulations preclude USCIS from granting immigration benefits to individuals with certain criminal or administrative violations. See, e.g., 8

is completed and a finding is made, the adjudicator uses the information provided from BCU and/or CFDO to determine whether the individual is eligible to receive the requested benefit.

These security procedures implemented post 9/11 and well after the establishment of the 30-day adjudication timeframe in 1994, coupled with sudden increases in applications, have extended adjudication and processing times for cases with potential eligibility issues discovered during background checks outside of the current regulatory 30-day timeframe. It would be contrary to USCIS' core missions and undermine the integrity of the documents issued if USCIS were to reduce or eliminate vetting procedures solely to meet a 30-day deadline established decades ago.

In sum, DHS is proposing to eliminate the 30-day processing provision at 8 CFR 208.7(a)(1) because of the increased volume of affirmative asylum applications and accompanying Applications for Employment Authorization, over two decades of changes in intake and EAD document production, and the need to appropriately vet applicants for fraud and national security concerns. DHS believes that the 30-day timeframe described in 8 CFR 208.7(a)(1) does not provide sufficient flexibility for DHS to meet its core missions of enforcing and administering our immigration laws and enhancing security.

Case processing time information may be found at <https://egov.uscis.gov/processing-times/>, and asylum applicants can access the web page for realistic processing times as USCIS regularly updates this information.

DHS welcomes public comment on all aspects of this proposal, including alternate suggestions for regulatory amendments to the 30-day processing timeframe not already discussed.

## 2. Removal of the 90-Day Filing Requirement

DHS proposes to remove 8 CFR 208.7(d), because 8 CFR 274a.13(d), as amended in 2017, serves the same policy purpose as 8 CFR 208.7(d), and is arguably at cross-purposes with such provision. Under the 2017 AC21 Rule, certain individuals eligible for employment authorization under designated categories may have the validity of their EADs extended for up to 180 days from the document's expiration date if they file an application to renew their EAD before the EAD's expiration date. See 8 CFR

274a.13(d)(1). Specifically, the 2017 AC21 Rule automatically extends the EADs falling within the designated categories as long as (1) the individual filed the request to renew his or her EAD before its expiration date, (2) the individual is requesting renewal based on the same employment authorization category under which the expiring EAD was granted, and (3) the individual's request for renewal is based on a class of aliens whose eligibility to apply for employment authorization continues even after the EAD expires, and is based on an employment authorization category that does not first require USCIS to adjudicate an underlying application, petition, or request. *Id.* As noted in the preamble to the 2017 AC21 Rule, and as currently reflected on the USCIS website, the automatic extension amendment applies to individuals who have properly filed applications for asylum. See *id.*; 8 CFR 274a.12(c)(8); 81 FR 82398 at 82455–56 n.98.<sup>23</sup>

Because the 2017 AC21 Rule effectively prevents gaps in work authorization for asylum applicants with expiring EADs, DHS finds it unnecessary to continue to require that pending asylum applicants file for EAD renewal at least 90 days before the EAD's scheduled expiration. The 2017 AC21 Rule amendment significantly mitigates the risk of gaps in employment authorization and required documentation for eligible individuals, providing consistency for employers who are responsible for verifying employment authorization. An additional 90-day requirement is unnecessary.

DHS implemented the 180-day automatic extension for eligible individuals, including pending asylum applicants for renewal EADs, in accordance with the 2017 AC21 Rule. As a result, the subject EADs are already automatically extended, even if the renewal EAD application has not been submitted at least 90 days in advance of its expiration. DHS therefore proposes to make a clarifying amendment to delete subsection (d) from 8 CFR 208.7. Under this change, pending asylum applicants would not need to submit Form I-765 renewal applications at least 90 days prior to the employment authorization expiration in order for the employment authorization to be renewed. Pending asylum applicants would be able to submit Form I-765 renewal applications up to 180 days prior to the employment authorization

expiration, as recommended by USCIS on its website, and the EAD would be automatically extended for up to 180 days from the date of expiration.<sup>24</sup> This proposed change would reduce confusion regarding EAD renewal application requirements for pending asylum applicants and ensure the regulatory text reflects current DHS policy and regulations under the 2017 AC21 Rule. DHS welcomes public comment on all aspects of this proposal.

## 3. Corresponding U.S. Department of Justice (DOJ) Regulations

This proposed rule would remove (1) the 30-day processing provision for initial employment authorization applications for those with pending asylum applications, and (2) the 90-day timeframe for receipt of an application to renew employment authorization. See 8 CFR 208(a)(1), and (d).

Currently, these provisions can be found in two parallel sets of regulations: Regulations under the authority of DHS are contained in 8 CFR part 208; and regulations under the authority of the Department of Justice (DOJ) are contained in 8 CFR part 1208. Each set of regulations contains substantially similar provisions regarding employment authorization, and each articulates both the 30-day provision for DHS adjudications and the 90-day timeframe for renewal applications before DHS. Compare 8 CFR 208.7(a)(1) and (d), with 8 CFR 1208.7(a)(1) and (d).

This proposed rule would revise only the DHS regulations at 8 CFR 208.7. Notwithstanding the language of the parallel DOJ regulations in 8 CFR 1208.7, as of the effective date of a final rule, the revised language of 8 CFR 208.7(a)(1) and removal of 8 CFR 208.7(d) would be binding on DHS and its adjudications. DHS would not be

<sup>24</sup> See 2017 AC21 Rule, 81 FR at 82401 (“Specifically, the rule automatically extends the employment authorization and validity of existing EADs issued to certain employment-eligible individuals for up to 180 days from the date of expiration, as long as: (1) A renewal application is filed based on the same employment authorization category as the previously issued EAD (or the renewal application is for an individual approved for Temporary Protected Status (TPS) whose EAD was issued under 8 CFR 274a.12(c)(19)); (2) the renewal application is timely filed prior to the expiration of the EAD (or, in accordance with an applicable **Federal Register** notice regarding procedures for renewing TPS-related employment documentation) and remains pending; and (3) the individual's eligibility for employment authorization continues beyond the expiration of the EAD and an independent adjudication of the underlying eligibility is not a prerequisite to the extension of employment authorization”); USCIS, Employment Authorization Document, <https://www.uscis.gov/greencard/employment-authorization-document> (“Generally, you should not file for a renewal EAD more than 180 days before your original EAD expires.”).

CFR 208.7(a)(1) (aggravated felony bar to employment authorization for asylum applicants).

<sup>23</sup> See also USCIS, Automatic Employment Authorization Document (EAD) Extension, <https://www.uscis.gov/working-united-states/automatic-employment-authorization-document-ead-extension>.



bound by the 30-day provision of the DOJ regulations at 8 CFR 1208.7(a)(1). DOJ has no authority to adjudicate employment authorization applications. DHS has been in consultation with DOJ on this proposed rule, and DOJ may issue conforming changes at a later date. DHS welcomes public comment on this matter.

#### IV. Statutory and Regulatory Requirements

##### *A. Executive Orders 12866 (Regulatory Planning and Review) and 13563 (Improving Regulation and Regulatory Review)*

Executive Orders 12866 and 13563 direct agencies to assess the costs and benefits of available regulatory alternatives and, if a regulation is necessary, to select regulatory approaches that maximize net benefits (including potential economic, environmental, public health and safety effects, distributive impacts, and equity). Executive Order 13563 emphasizes the importance of quantifying both costs and benefits, of reducing costs, of harmonizing rules, and of promoting flexibility. This proposed rule has been designated as a “significant regulatory action” and it is economically significant, since it meets the \$100 million threshold under section 3(f) of Executive Order 12866. Accordingly, the Office of Management and Budget (OMB) has reviewed this proposed regulation.

##### 1. Summary

DHS proposes to remove the requirement to adjudicate initial EAD applications for pending asylum applicants within 30 days. In FY 2017, prior to the *Rosario v. USCIS* court order, the adjudication processing times for initial Form I-765 under the Pending Asylum Applicant category exceeded the regulatory set timeframe of 30 days more than half the time. However, USCIS adjudicated approximately 78 percent of applications within 60 days. In response to the *Rosario v. USCIS* litigation and to comply with the court order, USCIS continues to resource the adjudication of pending asylum EAD applications. USCIS has dedicated as many resources as practicable to these adjudications, but continues to face an asylum application backlog, which in turn increases the numbers of applicants eligible for pending asylum EADs. However, this reallocation of resources is not a long-term sustainable solution because USCIS has many competing priorities and many time-sensitive adjudication timeframes. Reallocating resources in the long-term is not

sustainable due to work priorities in other product lines. USCIS could hire more officers, but that would not immediately and in all cases shorten adjudication timeframes because (1) additional time would be required to onboard and train new employees, and (2) for certain applications, additional time is needed to fully vet an applicant, regardless of staffing levels. In addition, there is currently no fee for asylum applications or the corresponding initial EAD applications, and the cost of adjudication is covered by fees paid by other benefit requesters. USCIS is uncertain of the actual cost impacts of hiring additional adjudicators to process these EAD applications at this time. If the backlog dissipates in the future, USCIS may seek to redistribute adjudication resources.

As a primary goal, USCIS seeks to adequately vet applicants and adjudicate applications as quickly and efficiently as possible. This proposed rule may delay the ability for some initial applicants whose EAD processing is delayed beyond the 30-day regulatory timeframe to work.

The impacts of this rule are measured against a baseline. This baseline is the best assessment of the way the world would look absent this proposed action. For this proposed action, USCIS assumes that in the absence of this proposed rule the baseline amount of time that USCIS would take to adjudicate would be 30 days. USCIS also assumes that if this proposed rule is adopted, adjudications will align with DHS processing times achieved in FY 2017 (before the *Rosario v. USCIS* court order). This is our best estimate of what would occur if the proposed rule is adopted. USCIS believes the FY 2017 timeframes are sustainable and USCIS intends to meet these timeframes if the proposed rule is adopted. Therefore, USCIS is analyzing the impacts of this rule by comparing the costs and benefits of adjudicating initial EAD applications for pending asylum applicants within 30 days compared to the actual time it took to adjudicate these EAD applications in FY 2017.

The impacts of this rule would include both distributional effects (which are transfers) and costs.<sup>25</sup> The distributional impacts would fall on the asylum applicants who would be delayed in entering the U.S. labor force. The distributional impacts (transfers)

<sup>25</sup> Transfer payments are monetary payments from one group to another that do not affect total resources available to society. See OMB Circular A-4 pages 14 and 38 for further discussion of transfer payments and distributional effects. Circular A-4 is available at: <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A4/a-4.pdf>.

would be in the form of lost compensation (wages and benefits). A portion of this lost compensation might be transferred from asylum applicants to others that are currently in the U.S. labor force, possibly in the form of additional work hours or overtime pay. A portion of the impacts of this rule would also be borne by companies that would have hired the asylum applicants had they been in the labor market earlier but were unable to find available workers. These companies would incur a cost, as they would be losing the productivity and potential profits the asylum applicant would have provided had the asylum applicant been in the labor force earlier. Companies may also incur opportunity costs by having to choose the next best alternative to immediately filling the job the asylum applicant would have filled. USCIS does not know what this next best alternative may be for those companies. As a result, USCIS does not know the portion of overall impacts of this rule that are transfers or costs. If companies can find replacement labor for the position the asylum applicant would have filled, this rule would have primarily distributional effects in the form of transfers from asylum applicants to others already in the labor market (or workers induced to return to the labor market). USCIS acknowledges that there may be additional opportunity costs to employers such as additional search costs. However, if companies cannot find reasonable substitutes for the labor the asylum applicants would have provided, this rule would primarily be a cost to these companies through lost productivity and profits. USCIS uses the lost compensation to asylum applicants as a measure of the overall impact of the rule—either as distributional impacts (transfers) or as a proxy for businesses’ cost for lost productivity. It does not include additional costs to businesses for lost profits and opportunity costs or the distributional impacts for those in an applicant’s support network. The lost compensation to asylum applicants could range from \$255.88 million to \$774.76 million annually depending on the wages the asylum applicant would have earned. The ten-year total discounted lost compensation to asylum applicants at 3 percent could range from \$2,182.68 million to \$6,608.90 million and at 7 percent could range from \$1,797.17 million to \$5,441.62 million (years 2019–2028). USCIS recognizes that the impacts of this proposed rule could be overstated if the provisions in the broader asylum EAD NPRM are finalized as proposed. Specifically, the broader asylum EAD NPRM would limit



or delay eligibility for employment authorization for certain asylum applicants. Accordingly, if the population of aliens is less than estimated as a result of the broader asylum EAD rule, the estimated impacts of this rule could be overstated because the population affected may be lower than estimated in this rule.

In instances where a company cannot transfer additional work onto current employees and cannot hire replacement labor for the position the asylum applicant would have filled, USCIS acknowledges that delays may result in tax losses to the government. It is difficult to quantify income tax losses because individual tax situations vary widely<sup>26</sup> but USCIS estimates the potential loss to other employment tax programs, namely Medicare and social security which have a combined tax rate of 7.65 percent (6.2 percent and 1.45 percent, respectively).<sup>27</sup> With both the employee and employer not paying their respective portion of Medicare and social security taxes, the total estimated tax loss for Medicare and social security is 15.3 percent.<sup>28</sup> Lost wages ranging

from \$255.88 million to \$774.76 million would result in employment tax losses to the government ranging from \$39.15 million to \$118.54 million.<sup>29</sup> Adding the lost compensation to the tax losses provide total monetized estimates of this proposed rule that range from \$275.46 million to \$834.03 million annually in instances where a company cannot hire replacement labor for the position the asylum applicant would have filled.<sup>30</sup> Again, depending on the circumstances of the employee, there could be additional federal income tax losses not estimated here. There may also be state and local income tax losses that would vary according to the jurisdiction.

This proposed rule would result in reduced opportunity costs to the Federal Government. Since *Rosario* compelled USCIS to comply with the 30-day provision in FY 2018, USCIS has redistributed its adjudication resources to work up to full compliance. If the 30-day timeframe is removed, these redistributed resources could be reallocated, potentially reducing delays in processing of other applications and avoiding costs associated with hiring additional employees. USCIS has not estimated these avoided costs. Additionally, USCIS does not anticipate

that removing the separate 90-day EAD filing requirement would result in any costs to the Federal Government.

The proposed rule would benefit USCIS by allowing it to operate under long-term sustainable case processing times for initial EAD applications for pending asylum applicants, to allow sufficient time to address national security and fraud concerns, and to maintain technological advances in document production and identify verification. Applicants would rely on up-to-date processing times, which will provide accurate expectations of adjudication times. The technical change to remove the 90-day filing requirement would reduce confusion regarding EAD renewal requirements for pending asylum applicants and ensure the regulatory text reflects current DHS policy and regulations under DHS's final 2017 AC21 Rule.<sup>31</sup>

Table 4 provides a detailed summary of the regulatory changes and the expected impacts of this proposed rule.

<sup>26</sup> See More than 44 percent of Americans pay no federal income tax (September 16, 2018) available at <https://www.marketwatch.com/story/81-million-americans-wont-pay-any-federal-income-taxes-this-year-heres-why-2018-04-16>.

<sup>27</sup> The various employment taxes are discussed in more detail at <https://www.irs.gov/businesses/small-businesses-self-employed/understanding-employment-taxes>. See IRS Publication 15, Circular E, Employer's Tax Guide for specific information on employment tax rates. [https://www.irs.gov/pub/irs-pdf/p15\\_18.pdf](https://www.irs.gov/pub/irs-pdf/p15_18.pdf).

<sup>28</sup> Calculation: (6.2 percent social security + 1.45 percent Medicare) × 2 employee and employer losses = 15.3 percent total estimated tax loss to government.

<sup>29</sup> Calculations: Lower bound lost wages \$255.88 million × 15.3 percent estimated tax rate = \$39.15 million. Upper bound lost wages \$774.76 million × 15.3 percent estimated tax rate = \$118.54 million.

<sup>30</sup> Calculation: Lower bound lost wages \$255.88 million + lower bound tax losses \$19.58 million = total lower bound cost \$275.46 million.

Upper bound lost wages \$774.76 million + upper bound tax losses \$59.27 million = total upper bound cost \$834.03 million.

<sup>31</sup> In the 2017 AC21 final rule, 81 FR 82398, USCIS amended 8 CFR 274a.13 to allow for the automatic extension of existing, valid EADs for up to 180 days for renewal applicants falling within certain EAD categories as described in the regulation and designated on the USCIS website. See 8 CFR 274a.13(d). Among those categories is asylum applicants. To benefit from the automatic extension, an applicant falling within an eligible category must (1) properly file his or her renewal request for employment authorization before its expiration date, (2) request renewal based on the same employment authorization category under which the expiring EAD was granted, and (3) will continue to be authorized for employment based on his or her status, even after the EAD expires, and is applying for renewal under a category that does not first require USCIS to adjudicate an underlying application, petition, or request.

TABLE 4—SUMMARY OF PROPOSED PROVISIONS AND IMPACTS

Current provision	Proposed change to provision	Expected costs and transfers from proposed provision	Expected benefits from proposed provision
USCIS has a 30-day EAD adjudication timeframe for applicants who have pending asylum applications.	USCIS proposes to eliminate the provisions for the 30-day adjudication timeframe and issuance of EADs for pending asylum applicants.	<p><i>Quantitative:</i></p> <p>This provision could delay the ability of some initial applicants to work. A portion of the impacts of the rule would be the lost compensation transferred from asylum applicants to others currently in the workforce, possibly in the form of additional work hours or overtime pay. A portion of the impacts of the rule would be lost productivity costs to companies that would have hired asylum applicants had they been in the labor market, but who were unable to find available workers. USCIS uses the lost compensation to asylum applicants as a measure of these distributional impacts (transfers) and as a proxy for businesses' cost for lost productivity. The lost compensation due to processing delays could range from \$255.88 million to \$774.76 million annually. The total ten-year discounted lost compensation for years 2019–2028 averages \$4,395.79 million and \$3,619.40 million at discount rates of 3 and 7 percent, respectively. USCIS does not know the portion of overall impacts of this rule that are transfers or costs. Lost wages ranging from \$255.88 million to \$774.76 million would result in employment tax losses to the government ranging from \$39.15 million to \$118.54 million.</p> <p><i>Qualitative:</i></p> <p>There may also be additional distributional impacts for those in an applicant's support network—if applicants are unable to work legally, they may need to rely on resources from family members, friends, non-profits, or government entities for support.</p>	<p><i>Quantitative:</i></p> <p>Not estimated.</p> <p><i>Qualitative:</i></p> <p>DHS would be able to operate under long-term sustainable case processing times for initial EAD applications for pending asylum applicants, to allow sufficient time to address national security and fraud concerns, and to maintain technological advances in document production and identity verification without having to add any resources.</p> <p>This rule would result in reduced opportunity costs to the Federal Government. If the 30-day timeframe is removed, USCIS could reallocate the resources it redistributed to comply with the 30-day provision, potentially reducing delays in processing of other applications and avoiding costs associated with hiring additional employees.</p>
Applicants can currently submit a renewal EAD application 90 days before the expiration of their current EAD.	USCIS proposes to remove the 90-day submission requirement for renewal EAD applications.	<p><i>Quantitative:</i></p> <p>None.</p> <p><i>Qualitative:</i></p> <p>None.</p>	<p><i>Qualitative:</i></p> <p>None.</p> <p><i>Qualitative:</i></p> <p>Applicants— Reduces confusion regarding EAD renewal requirements. Some confusion may nonetheless remain if applicants consult outdated versions of regulations or inapplicable DOJ regulations.</p> <p>DHS/USCIS— The regulations would be updated to match those of other EAD categories.</p>

As previously discussed, USCIS does not know the portion of overall impacts of this rule that are transfers or costs, but estimates that the maximum monetized impact of this rule from lost compensation is \$774.76 million annually. If all companies are able to easily find reasonable labor substitutes for the positions the asylum applicants would have filled, they will bear little or no costs, so \$774.76 million will be transferred from asylum applicants to

workers currently in the labor force or induced back into the labor force (we assume no tax losses as a labor substitute was found). Conversely, if companies are unable to find reasonable labor substitutes for the position the asylum applicant would have filled then \$774.76 million is the estimated maximum monetized cost of the rule and \$0 is the estimated minimum in monetized transfers from asylum applicants to other workers. In addition,

under this scenario, because the jobs would go unfilled there would be a loss of employment taxes to the Federal Government. USCIS estimates \$118.54 million as the maximum decrease in employment tax transfers from companies and employees to the Federal Government. The two scenarios described above represent the estimated endpoints for the range of monetized impacts resulting from this rule, and are summarized in Table 5 below.

TABLE 5—SUMMARY OF RANGE OF MONETIZED IMPACTS

Category	Description	Scenario: No replacement labor found for asylum applicants		Scenario: All asylum applicants replaced with other workers		Primary (half of the highest high for each row)
		Low wage	High wage	Low wage	High wage	
Cost .....	Lost compensation used as proxy for lost productivity to companies.	\$255.88	\$774.76	\$0.00	\$0.00	\$387.38
Transfer .....	Compensation transferred from asylum applicants to other workers.	0.00	0.00	255.88	774.76	387.38
Transfer .....	Lost employment taxes paid to the Federal Government ....	39.15	118.54	0.00	0.00	59.27

As required by OMB Circular A–4, Table 6 presents the prepared A–4 accounting statement showing the costs and transfers associated with this proposed regulation. For the purposes of the A–4 accounting statement below, USCIS uses the mid-point as the primary estimate for both costs and

transfers because the total monetized impact of the rule from lost compensation cannot exceed \$774.76 million and as described, USCIS is unable to apportion the impacts between costs and transfers. Likewise, USCIS uses a mid-point for the reduction in employment tax transfers

from companies and employees to the Federal Government when companies are unable to easily find replacement workers. USCIS notes that there may be some unmonetized costs such as additional opportunity costs to employers that would not be captured in these monetized estimates.

TABLE 6—OMB A–4 ACCOUNTING STATEMENT (\$ MILLIONS, 2017)  
[Period of analysis: 2019–2028]

Category	Primary estimate		Minimum estimate	Maximum estimate	Source citation (RIA, preamble, etc.)
Benefits					
Monetized Benefits .....	(7%) (3%)	N/A N/A	N/A N/A	N/A N/A	RIA. RIA.
Annualized quantified, but un-monetized, benefits .....		0	0	0	RIA.
Unquantified Benefits .....	Applicants would benefit from reduced confusion over renewal requirements. DHS would be able to operate under sustainable case processing times for initial EAD applications for pending asylum applicants, to allow sufficient time to address national security and fraud concerns, and to maintain technological advances in document production and identity verification.				RIA.
Costs					
Annualized monetized costs (discount rate in parenthesis) .....	(7%) (3%)	\$387.38 \$387.38	\$0 \$0	\$774.76 \$774.76	RIA. RIA.
Annualized quantified, but un-monetized, costs .....	N/A		N/A	N/A	RIA.
Qualitative (unquantified) costs .....	In cases where companies cannot find reasonable substitutes for the labor the asylum applicants would have provided, affected companies would also lose profits from the lost productivity. In all cases, companies would incur opportunity costs by having to choose the next best alternative to immediately filling the job the pending asylum applicant would have filled. There may be additional opportunity costs to employers such as additional search costs.		RIA.		
Transfers					
Annualized monetized transfers: “on budget” .....	(7%) (3%)	\$0 \$0	\$0 \$0	\$0 \$0	RIA.
From whom to whom? .....	N/A				N/A.
Annualized monetized transfers: “off-budget” .....	(7%) (3%)	\$387.38 \$387.38	\$0 \$0	\$774.76 \$774.76	RIA.
From whom to whom? .....	From asylum applicants to workers in the U.S. labor force or induced into the U.S. labor force. Additional distributional impacts from asylum applicant to the asylum applicant's support network that provides for the asylum applicant while awaiting an EAD.				RIA.
Annualized monetized transfers: “off-budget” .....	(7%) (3%)	\$59.27 \$59.27	\$0 \$0	\$118.54 \$118.54	RIA.
From whom to whom? .....	A reduction in employment taxes from companies and employees to the Federal Government. There could also be a transfer of federal, state, and local income tax revenue.				



Category	Effects	Source citation (RIA, preamble, etc.)
Effects on state, local, and/or tribal governments .....	None; no significant impacts to national labor force or to the labor force of individual states is expected. Possible loss of tax revenue.	RIA.
Effects on small businesses .....	None .....	RFA.
Effects on wages .....	None .....	RIA.
Effects on growth .....	None .....	RIA.

## 2. Background and Purpose of the Proposed Rule

Aliens who are arriving or physically present in the United States generally may apply for asylum in the United States irrespective of their immigration status. To establish eligibility for asylum, an applicant must demonstrate, among other things, that they have suffered past persecution or have a well-founded fear of future persecution on account of race, religion, nationality, membership in a particular social group, or political opinion. Applicants, with limited exceptions, are required to apply for asylum within one year of their last arrival in the United States. USCIS does not currently charge filing fees for certain humanitarian benefits, including asylum applications and applications concurrently filed with asylum applications. Asylum applicants whose cases remain pending without a decision for at least 150 days are eligible to apply for employment authorization, unless any delays are caused by the applicant (such as a request to reschedule an interview). 8 CFR 208.7, 274a.12(c)(8), 274a.13(a)(2). Applicants who are granted asylum (“asylees”) may work immediately. *See* INA 208(c)(1)(B), 8 U.S.C. 1158(c)(1)(B). An asylee may choose to obtain an EAD for convenience or identification purposes, but this documentation is not necessary for an asylee to work. 8 CFR 274a.12(a)(5).

Currently, DHS regulations at 8 CFR 208.7(a)(1) provide that USCIS adjudicates a Form I-765 within 30 days of receiving a properly filed application from a pending asylum applicant. Asylum applicants must wait 150 days from the time of filing the asylum application before they can file a Form I-765. USCIS cannot grant employment authorization until the applicant has accumulated a total of 180 days, not including any delays caused or requested by the applicant, meaning the applicant’s asylum case has been pending for a total of 180 days. 8 CFR 208.7(a)(1)–(2). This is known as the 180-Day Asylum EAD clock.<sup>32</sup> If USCIS

approves the Form I-765, USCIS mails an EAD according to the mailing preferences indicated by the applicant. If USCIS denies the Form I-765, the agency sends a written notice to the applicant explaining the basis for denial.

However, if USCIS requires additional documentation from the applicant before a decision can be made, USCIS sends a request for evidence (RFE) and the 30-day processing timeframe for processing a Form I-765 is paused until additional documentation is received. Once USCIS receives all requested information in response to the RFE, the 30-day timeframe continues from the point at which it stopped. In some instances, applications may require additional vetting by the Background Check Unit (BCU) and the Center Fraud Detection Operations (CFDO), for instance, to verify an applicant’s identity. The 30-day timeframe does not stop in these situations, though these cases may take longer than 30 days to process. USCIS would make a decision only after all eligibility and background checks relating to the EAD application have been completed.

DHS considers the 30-day adjudication timeframe to be outdated, as it no longer reflects current DHS operational realities. In the 20-plus years since the timeframe was established, there has been a shift to centralized processing as well as increased security measures, such as the creation of tamper-resistant EAD cards. These measures reduce opportunities for fraud but can require additional processing time, especially as filing volumes remain high. By eliminating the 30-day provision, DHS would be able to maintain accurate case processing times for initial EAD applications for pending asylum applicants since, prior to the *Rosario v. USCIS* court order, it was not meeting the 30-day regulatory timeframe most of the time (53 percent), to address national security and fraud concerns for those applications that require additional vetting through RFEs or

referrals to BCU and/or CFDO, and to maintain technological advances in document production and identity verification that USCIS must fulfill as a part of its core mission within DHS such as the centralized production and creation of tamper-resistant cards.

As noted above, the need for this rule results in part from the resource burden associated with adjudicating, within the 30-day adjudication timeframe, a large number of initial Forms I-765 under the Pending Asylum Applicant category. The large number of applications results from a range of factors, such as recent growth in USCIS’s asylum backlog, which USCIS continues to address through a number of different measures.

For example, in an effort to stem the growth of the agency’s asylum backlog, USCIS returned to processing affirmative asylum applications on a “last in, first out” (LIFO) basis. Starting January 29, 2018, USCIS began prioritizing the most recently filed affirmative asylum applications when scheduling asylum interviews. The former INS first established this interview scheduling approach as part of asylum reforms implemented in January 1995 and it remained in place until December 2014. USCIS has returned to this approach in order to deter individuals from using asylum backlogs solely as a means to obtain employment authorization by filing frivolous, fraudulent or otherwise non-meritorious asylum applications. Giving priority to recent filings allows USCIS to promptly adjudicate asylum applications.<sup>33</sup>

Another possible effect of reinstating LIFO is that in the future, fewer affirmative asylum applications would remain pending before USCIS for 150 days. However, the majority of asylum

<sup>32</sup> See The 180-Day Asylum EAD Clock Notice (May 9, 2017) <https://www.uscis.gov/sites/default/>

[files/USCIS/Humanitarian/Refugees%20%26%20Asylum/Asylum\\_Clock\\_Joint\\_Notice\\_-\\_revised\\_05-10-2017.pdf](https://www.uscis.gov/sites/default/files/USCIS/Humanitarian/Refugees%20%26%20Asylum/Asylum_Clock_Joint_Notice_-_revised_05-10-2017.pdf).

<sup>33</sup> USCIS now schedules asylum interviews based on three priority levels. First priority: Applications scheduled for an interview, but the interview had to be rescheduled at the applicant’s request or the needs of USCIS. Second priority: Applications pending 21 days or less. Third priority: All other pending affirmative asylum applications, which will be scheduled for interviews starting with newer filings and working back towards older filings. *See* Affirmative Asylum Interview Scheduling (Jan. 26, 2018), available at <https://www.uscis.gov/humanitarian/refugees-asylum/asylum/affirmative-asylum-interview-scheduling>.

applications filed with USCIS have been referred to the Department of Justice Executive Office for Immigration Review (EOIR) for consideration of the asylum application by an immigration judge. In FY 2017, 53 percent of asylum filings processed by USCIS resulted in a referral to an immigration judge.<sup>34</sup> These applicants may be eligible to apply for an initial EAD under the (c)(8) category once the Asylum EAD Clock reaches 150 days. USCIS anticipates updating its data in the analysis accompanying the final rule. If this and other reforms are successful, such updated data may reflect a relative reduction in application volumes.

In the end, however, USCIS cannot predict with certainty how LIFO and other administrative measures, as well as external factors such as immigration court backlogs and changes in country conditions, will ultimately affect total application volumes and the attendant resource burdens on USCIS. In addition, in light of the need to accommodate existing vetting requirements and to maintain flexibility should trends change, USCIS believes that even if it could reliably project a reduction in total application volume, such reduction would not, on its own, serve as a sufficient basis to leave the 30-day adjudication timeframe in place.

Finally, once an EAD is approved under the (c)(8) Pending Asylum

Applicant category, it is valid for two years and requires renewal to extend an applicant's employment authorization if the underlying asylum application remains pending.<sup>35</sup> Currently, DHS regulations at 8 CFR 208.7(d) require that USCIS must receive renewal applications at least 90 days prior to the employment authorization expiration.<sup>36</sup> Removing the 90-day requirement would bring 8 CFR 208.7(d) in line with 8 CFR 274a.13(d), as amended in 2017; such amendments automatically extend renewal applications for up to 180 days. Additionally, under the 2017 AC21 Rule, applicants eligible for employment authorization can have the validity of their EADs automatically extended for up to 180 days from the document's expiration date, if they (1) file before its expiration date, (2) are requesting renewal based on the same employment authorization category under which the expiring EAD was granted, and (3) will continue to be authorized for employment based on their status, even after the EAD expires and are applying for renewal under a category that does not first require USCIS to adjudicate an underlying application, petition, or request.

### 3. Population

In FY 2017, USCIS received a total of 142,760 affirmative filings of Form I-589 applications for asylum. The

number of total receipts for asylum applicants has risen sharply over the last five years, increasing over 221 percent from FY 2013 to FY 2017 (Table 7). As the number of asylum applicants increases, the backlog continues to grow,<sup>37</sup> resulting in a greater number of people who are eligible to apply for EADs while they await adjudication of their asylum application.

**TABLE 7—TOTAL ANNUAL FORM I-589 RECEIPTS RECEIVED FROM AFFIRMATIVE ASYLUM APPLICANTS<sup>38</sup>**

Fiscal year	Total receipts
2013 .....	44,453
2014 .....	56,912
2015 .....	84,236
2016 .....	115,888
2017 .....	142,760

Source: All USCIS Application and Petition Form Types, All Form Types Performance Data (Fiscal Year 2013–2017, 4th Qtr), <https://www.uscis.gov/tools/reports-studies/immigration-forms-data/data-set-all-uscis-application-and-petition-form-types>.

This larger number of applications strains resources, which leads to longer processing times for Form I-765 adjudication. Table 8 shows the total, initial, and renewal applications received for Form I-765 for asylum applicants for FYs 2013 to 2017.<sup>39</sup>

**TABLE 8—TOTAL ANNUAL FORM I-765 RECEIPTS RECEIVED FROM PENDING ASYLUM APPLICANTS**

Fiscal year	Total receipts *	Total initial receipts	Total renewal receipts
2013 .....	79,571	41,021	37,861
2014 .....	110,210	62,169	47,103
2015 .....	180,196	106,030	72,559
2016 .....	300,855	169,970	128,610
2017 .....	478,721	261,782	212,255
Average .....	229,911	128,194	99,678

Source: USCIS, Office of Performance and Quality.

\* Total receipts do not include replacement receipts. Therefore, initial and renewal receipts will not equal to total receipts.

**Note:** This data includes receipts received from both affirmative and defensive pending asylum applicants.

<sup>34</sup> See Notes from Previous Engagements, Asylum Division Quarterly Stakeholder Meeting (Feb. 7, May 2, Aug. 11, and Nov. 3, 2017), [https://www.uscis.gov/outreach/notes-previous-engagements?topic\\_id=9213&field\\_release\\_date\\_value%5Bvalue%5D%5Bmonth%5D=&field\\_release\\_date\\_value%5Bvalue%5D%5Byear%5D=&multiple=&items\\_per\\_page=10](https://www.uscis.gov/outreach/notes-previous-engagements?topic_id=9213&field_release_date_value%5Bvalue%5D%5Bmonth%5D=&field_release_date_value%5Bvalue%5D%5Byear%5D=&multiple=&items_per_page=10).

<sup>35</sup> EADs issued prior to October 5, 2016 had a validity period of one year. See USCIS Increases Validity of Work Permits to Two Years for Asylum Applicants (Oct. 6, 2016), available at <https://www.uscis.gov/news/alerts/uscis-increases-validity-work-permits-two-years-asylum-applicants>.

<sup>36</sup> For renewal applications, a properly filed application for pending asylum applicants is one that is complete, signed, accompanied by all necessary documentation and the current filing fee of \$410.

<sup>37</sup> As of June 2018, the asylum backlog was still increasing, but its growth rate has begun to stabilize.

<sup>38</sup> These numbers only address the affirmative asylum applications that fall under the jurisdiction of USCIS' Asylum Division. Defensive asylum applications, filed with the Department of Justice's Executive Office for Immigration Review (EOIR) are also eligible for (c)(8) EADs. There is an ongoing backlog of pending defensive asylum cases at EOIR, which has approximately 650,000 cases pending.

See Memorandum from Jeff Sessions, Attorney General, *Renewing Our Commitment to the Timely and Efficient Adjudication of Immigration Cases to Serve the National Interest* (Dec. 5, 2017). The defensive asylum backlog at EOIR also contributes to an increase in both initial and renewal (c)(8) EAD applications.

<sup>39</sup> Since LIFO was reinstated at the end of January 2018, there is not yet enough data currently available to determine the impact on asylum applications or initial EAD applications. USCIS anticipates updating its data in the analysis accompanying the final rule. If this and other reforms are successful, such updated data may reflect a relative reduction in application volumes.

In FY 2017, USCIS received a total of 478,721 applications for Form I-765 from pending asylum applicants, with more than half as initial applications (261,782 or 54.7 percent). There were 212,255 renewal applications (44.3 percent) in FY 2017. This trend is similar across all five fiscal years. The five-year average of total applications received was 229,911, with five-year averages of 128,194 initial applications and 99,678 renewal applications.

For this analysis, USCIS does not use a trend line to forecast future projected applications because various factors outside of this rulemaking may result in either a decline or, conversely, a continued rise of applications received. For example, while the number of initial applicants and renewals has risen sharply over the last five years, DHS assumes the increase in initial EAD applications has some correlation with the increase in applications for asylum. As pending asylum applications

increase, the length of time it takes to adjudicate those applications increases, and it is reasonable to assume that the number of applicants who seek employment authorization on the basis of that underlying asylum application would also rise. On the other hand, initial EAD applications may decline. For instance, USCIS' return to a LIFO interview schedule to process affirmative asylum applications, may help stem the growth of the agency's asylum backlog, and may result in fewer pending asylum applicants applying for an EAD. But USCIS cannot predict such an outcome with certainty at this time. Therefore, since DHS anticipates similar outcomes to those achieved in FY 2017, USCIS anticipates receiving approximately 478,721 Form I-765 applications annually from pending asylum applicants, with an estimated 261,782 initial applications and 212,255 renewal applications.

In order to analyze USCIS processing times for Form I-765, USCIS obtained data on completed initial applications, which included the length of time to complete adjudication and information on investigative factors that may prolong the adjudication process. Table 9 differentiates between initial applications that USCIS adjudicated within the 30-day timeframe in FY 2017 and those that it did not. The table also includes the initial applications that were adjudicated within a 60-day timeframe in FY 2017, along with the corresponding initial applications that required additional vetting. This additional vetting includes the issuance of RFEs and referrals for identity verification by the BCU and the CFDO, which can cause delays in processing. DHS notes that the 30-day timeframe pauses for RFEs but does not pause for BCU or CFDO checks. Delays could also be caused by rescheduled fingerprinting.

TABLE 9—PERCENTAGE OF COMPLETIONS FOR INITIAL FORM I-765 FOR PENDING ASYLUM APPLICANTS IN FY 2017

Number of days the initial application was pending	No additional vetting required (percent)		Additional vetting required (percent)		Total (percent)
	Approved initial applications	Denied initial applications	Approved initial applications	Denied initial applications	
0–30 .....	42	2	3	0	47
31–60 .....	22	2	6	1	31
Over 60 .....	12	2	6	2	22
Total (percent) .....	76	5	16	3	100

Source: USCIS, Office of Performance and Quality.

**Note:** Additional vetting includes the applications issued an RFE, referred to BCU/CFDO and both.

In FY 2017, USCIS adjudicated within the 30-day timeframe just under half (47 percent) of all initial Form I-765 applications received. USCIS approved within 30 days 45 percent<sup>40</sup> of the initial applications received and denied 2 percent that did not require any additional vetting. Among the approved applications, only 3 percent of the total required additional vetting, while 42 percent did not. USCIS' completion rate within a 60-day timeframe increased to 78 percent overall, with 73 percent<sup>41</sup> of applications approved and 5 percent<sup>42</sup>

denied. Only 10 percent<sup>43</sup> of applications adjudicated within 60 days required additional vetting, while the majority of approved applications did not (68 percent of the total).<sup>44</sup>

In FY 2017, prior to the *Rosario v. USCIS* court order, the majority of applications (53 percent) did not meet the required 30-day adjudication timeframe. In fact, it took up to 60 days for USCIS to adjudicate the majority of applications. For applications that require additional vetting, most applications took more than 30 days to adjudicate as well. "Additional vetting"

cases include those where an RFE is issued, which pauses the regulatory processing time. The findings in Table 9 underscore that, while additional vetting and other delays may contribute to increased processing times, it may not be the only reason processing times have increased. It is likely that the increasing number of initial EAD applications is due to increasing asylum receipts, the asylum interview backlogs, and updated operations as outlined in the background of this proposed rule.

With the removal of the 30-day adjudication timeframe, DHS anticipates similar outcomes to those achieved in FY 2017. DHS's primary goal is to adequately vet applicants and adjudicate cases as quickly and efficiently as possible. DHS welcomes public comment on the above analysis, including the methodology used for the population estimates of this proposed rule and the analysis of processing times.

<sup>40</sup> Calculation of 30-day Approved: 42 (No Additional Vetting Percent Approved 0–30 days) + 3 (Additional Vetting Percent Approved 0–30 days) = 45 percent.

<sup>41</sup> Calculation of 60-day Approved: 42 (No Additional Vetting Percent Approved 0–30 days) + 22 (No Additional Vetting Percent Approved 31–60 days) + 3 (Additional Vetting Percent Approved 0–30 days) + 6 (Additional Vetting Percent Approved 31–60 days) = 73 percent.

<sup>42</sup> Calculation of 60-day Denied: 2 (No Additional Vetting Percent Denied 0–30 days) + 2 (No Additional Vetting Percent Denied 31–60 days) + 1

(Additional Vetting Percent Denied 31–60 days) = 5 percent.

<sup>43</sup> Calculation of 60-day Additional Vetting: 3 (Additional Vetting Percent Approved 0–30 days) + 6 (Additional Vetting Percent Approved 31–60 days) + 1 (Additional Vetting Percent Denied 31–60 days) = 10 percent.

<sup>44</sup> Calculation of 60-day No Additional Vetting: 42 (No Additional Vetting Percent Approved 0–30 days) + 22 (No Additional Vetting Percent Approved 31–60 days) + 2 (No Additional Vetting Percent Denied 0–30 days) + 2 (No Additional Vetting Percent Denied 31–60 days) = 68 percent.



#### 4. Transfers, Costs and Benefits of This Proposed Rule

##### (1) Transfers and Costs

The proposed rule would remove the 30-day adjudication timeframe in order to better align with DHS processing times achieved in FY 2017. USCIS recognizes that removing the 30-day regulatory timeframe could potentially result in longer processing times for some applicants and in such situations, this could lead to potential delays in employment authorization for some initial EAD applicants. As described above, these delays would have both distributional effects (which are transfers) and costs. Any delay beyond the regulatory 30-day timeframe would prevent an EAD applicant, if his or her application were approved, from earning wages and other benefits until authorization is obtained. A portion of this lost compensation would be a distributional impact and considered a transfer from asylum applicants to others that are currently in the U.S. labor force, possibly in the form of additional work hours or overtime pay. In cases where companies that would have hired asylum applicants had they been in the labor market earlier are not able to find available workers, the lost compensation to asylum workers would be considered a proxy for the cost of lost productivity to those companies. However, USCIS does not know the portion of the overall impacts of this rule that are transfers or costs. One reason USCIS is unable to apportion these impacts is because the industries in which asylum applicants will work with their employment authorization is unknown; companies' responses to such a situation will vary depending on the industry and location of the company (e.g., truck drivers are limited to the number of overtime hours they can work). Additional uncertainty in how companies will respond exists because while the official unemployment rate is low, there is still evidence of some labor market slack.<sup>45</sup> While USCIS is unable to apportion these impacts between

transfers and costs, USCIS does use the lost compensation to asylum applicants, as described below, as a measure of these total impacts.

In FY 2017, the processing times for initial Form I-765 under the Pending Asylum Applicant category exceeded the regulatory set timeframe of 30 days more than half the time. However, USCIS adjudicated approximately 78 percent of applications within 60 days. To estimate lost wages and other benefits, USCIS used FY 2017 daily processing data. In FY 2017, USCIS adjudicated 119,088 approved applications<sup>46</sup> past the regulatory set timeframe. USCIS recognizes that pending asylum EAD applicants do not currently participate in the U.S. labor market, and, as a result, are not represented in national average wage calculations. Further, USCIS recognizes that pending asylum applicants who obtain an EAD are not limited to certain types of employment or occupations nor does USCIS track the type of employment applicants obtain. Because the Form I-765(c8) does not include or legally require, at the initial or renewal stage, any data on employment, and, since it does not involve an associated labor condition application (LCA), DHS has no information on wages, occupations, industries, or businesses that may involve such workers. In some DHS rulemakings, the estimates of distributional impacts and time-related opportunity costs are linked to the federal minimum wage for new entrants to the labor force. This reliance is grounded in the notion that most of the relevant EAD holders would not have been in the labor force long, and would thus not be expected to earn relatively high wages. In this proposed rulemaking, we rely on a slightly more robust "prevailing" minimum wage of \$8.25. As is reported by the Economic Policy Institute (EPI, 2016), many states have their own minimum wage, and, even within states, there are multiple tiers.<sup>47</sup> Although the minimum wage could be considered a lower-end bound

on true earnings, the prevailing minimum wage is fully loaded, at \$12.05, which 13.8 percent higher than the federal minimum wage.<sup>48</sup> DHS does not rule out the possibility that some portion of the population might earn wages at the average level for all occupations, but without solid a priori information we believe that providing a range with the lower bound relying on the prevailing minimum wage is justifiable. Therefore, for the purpose of this analysis, USCIS uses both the prevailing minimum hourly wage rate of \$8.25 to estimate a lower bound and a national average wage rate of \$24.98<sup>49</sup> to take into consideration the variance in average wages across states as an upper bound.

In order to estimate the fully loaded wage rates, to include benefits such as paid leave, insurance, and retirement using the most recent Bureau of Labor Statistics (BLS) data, USCIS calculated a benefits-to-wage multiplier of 1.46<sup>50</sup> and multiplied it by the prevailing minimum hourly wage rate. The fully loaded per hour wage rate for someone earning the prevailing minimum wage rate is \$12.05<sup>51</sup> and \$36.47<sup>52</sup> for someone earning the average wage rate. Multiplying these fully loaded hourly wage rates by 8 to reflect an assumed 8-hour workday produces daily wage rates of \$96.36 and \$291.77,<sup>53</sup> respectively. USCIS also assumes that EAD holders would work 5 out of every 7 days, or an average of 21 days per month.

Using FY 2017 data, USCIS estimates that the 119,088 approved EAD applicants experienced an estimated

<sup>48</sup> Calculations (1) for prevailing minimum wage: \$8.25 Hourly wage × benefits burden of 1.46 = \$12.05; for federal minimum wage: \$7.25 hourly wage × benefits burden of 1.46 = \$10.59. See Minimum Wage, U.S. Department of Labor available at <https://www.dol.gov/general/topic/wages/minimum-wage>; (2) ((\$12.05 wage - \$10.59 wage) / \$10.59) wage = .1378, which rounded and multiplied by 100 = 13.8 percent.

<sup>49</sup> The wage update in April 2018 reflects the 2017 average for all occupations nationally. The data are found at the BLS Occupational Employment and Wage Estimates, United States, found at: [https://www.bls.gov/oes/2018/may/oes\\_nat.htm#00-0000](https://www.bls.gov/oes/2018/may/oes_nat.htm#00-0000).

<sup>50</sup> The benefits-to-wage multiplier is calculated by the Bureau of Labor Statistics (BLS) as follows: (\$36.32 Total Employee Compensation per hour) / (\$24.91 Wages and Salaries per hour) = 1.458 (1.46 rounded). See U.S. Department of Labor, Bureau of Labor Statistics, Economic News Release, Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group (April 2019), available at [https://www.bls.gov/news.release/archives/ecec\\_03192019.pdf](https://www.bls.gov/news.release/archives/ecec_03192019.pdf).

<sup>51</sup> Calculation: \$8.25 × 1.46 = \$12.05 per hour.

<sup>52</sup> Calculation: \$24.98 × 1.46 = \$36.47 per hour.

<sup>53</sup> Calculations: \$12.05 per hour × 8 hours = \$96.36 per day; \$36.47 per hour × 8 hours = \$291.77 per day.

<sup>45</sup> See Bureau of Labor Statistics, *Employment Situation News Release*, Nov. 2, 2018, [https://www.bls.gov/news.release/archives/empst\\_11022018.pdf](https://www.bls.gov/news.release/archives/empst_11022018.pdf).

It reports that "the number of persons employed part time for economic reasons (sometimes referred to as involuntary part-time workers) was essentially unchanged at 4.6 million in October. These individuals, who would have preferred full-time employment, were working part time because their hours had been reduced, or they were unable to find full-time jobs." It reports also that "In October, 1.5 million persons were marginally attached to the labor force . . . These individuals were not in the labor force, wanted and were available for work, and had looked for a job sometime in the prior 12 months."

<sup>46</sup> In FY 2017, USCIS adjudicated 15,860 denied (c)(8) EAD applications past the regulatory set timeframe. Since denied applicants would not obtain work authorization and would not lose working days, this population is not be impacted by this proposed rule and are therefore not included in the analysis for lost compensation.

<sup>47</sup> See *When it comes to the minimum wage, we cannot just 'leave it to the states'* (November 10, 2016) available at: <https://www.epi.org/publication/when-it-comes-to-the-minimum-wage-we-cannot-just-leave-it-to-the-states-effective-state-minimum-wages-today-and-projected-for-2020/>. There are multiple tiers of minimum wages across many states that apply to size of business (revenue and employment), occupations, working hours, and other criteria. Some of these variations per state are described at: <https://www.minimum-wage.org>.



total 2,655,429 lost working days, and lost compensation could range from \$255.88 million to \$774.76 million.<sup>54</sup> USCIS understands that not all EAD recipients would work in minimum or average wage occupations, but provides these estimates as possible lower and upper bounds for approved applicants

who would engage in full-time employment. Table 10 shows the number of applicants completed in a period longer than the 30-day regulatory timeframe in FY 2017, the associated number of lost working days, and an estimate of the resulting lost compensation. The two categories over

120 days show the declining number of applications that remain pending after 200 days and the maximum number of days it took to adjudicate an initial EAD completed in FY 2017, which was 810 calendar days.

TABLE 10—SUMMARY OF CALCULATIONS FOR INITIAL FORM I-765 FOR PENDING ASYLUM APPLICANTS IN FY 2017

	31–60 Days	61–90 Days	91–120 Days	121–200 Days	201–810 Days	Total
FY 2017 Completions .....	71,556	31,356	11,734	4,048	394	119,088
Lost Calendar Days .....	899,402	1,377,308	817,073	466,524	91,019	3,651,326
Lost Working Days .....	691,314	992,880	581,237	330,038	59,960	2,655,429
Lost Compensation (lower bound) .....	\$66,615,017	\$95,673,917	\$56,007,997	\$31,802,462	\$5,777,746	\$255,877,138
Lost Compensation (upper bound) .....	\$201,702,197	\$289,689,023	\$169,585,427	\$96,293,999	\$17,494,313	\$774,764,960

Source: USCIS analysis.

**Note:** To calculate lost compensation USCIS uses the fully-loaded wages based on the prevailing minimum wage to calculate the lower bound and a national average wage to calculate the upper bound.

If companies can find replacement labor for the position the asylum applicant would have filled, this rule would have primarily distributional effects in the form of transfers from asylum applicants to others already in the labor market (or workers induced to return to the labor market). USCIS acknowledges that there may be additional opportunity costs to employers such as additional search costs. However, if companies cannot find reasonable substitutes for the labor the asylum applicants would have provided, this rule would primarily be a cost to these companies through lost productivity. USCIS requests comments on how it can apportion these impacts between transfers and costs.

USCIS also recognizes that companies would incur additional costs not captured in the estimates of lost compensation above. In cases where companies cannot find reasonable substitutes for the labor the asylum applicants would have provided, affected companies would also lose profits from the lost productivity. In all cases, companies would incur opportunity costs by having to choose the next best alternative to immediately filling the job the pending asylum applicant would have filled.

USCIS continues to resource the adjudication of pending asylum EAD applications. In response to the *Rosario v. USCIS* litigation and to comply with the court order, USCIS has dedicated as

many resources as practicable to these adjudications but continues to face an increasing asylum application backlog, which in turn increases the numbers of applicants eligible for pending asylum EADs. However, this reallocation of resources is not a long-term sustainable solution because USCIS has many competing priorities and many time-sensitive adjudication timeframes. Reallocating resources in the long-term is not sustainable due to work priorities in other product lines. USCIS could hire more officers, but that would not immediately and in all cases shorten adjudication timeframes because (1) additional time would be required to onboard and train new employees and (2) for certain applications, additional time is needed to fully vet an applicant, regardless of staffing levels. In addition, there is currently no fee for asylum applications or the corresponding initial EAD applications, and the cost of adjudication is covered by fees paid by other benefit requesters. USCIS is uncertain of the actual cost impacts of hiring additional adjudicators to process these EAD applications at this time. If the backlog dissipates in the future, USCIS may seek to redistribute adjudication resources. USCIS may also redistribute adjudication resources for other operational needs.

This proposed rule may result in a delay for some applicants to earn compensation if EAD processing is delayed beyond the 30-day regulatory

timeframe. The lost compensation to asylum applicants could range from \$255.88 million to \$774.76 million annually, depending on the wages the asylum applicant would have earned. The ten-year total discounted costs at 3 percent could range from \$2,182.68 million to \$6,608.90 million and at 7 percent could range from \$1,797.17 million to \$5,441.62 million (years 2019–2028). USCIS recognizes that the impacts of this proposed rule could be overstated if the provisions in the broader asylum EAD NPRM are finalized as proposed.

In instances where a company cannot hire replacement labor for the position the asylum applicant would have filled, USCIS acknowledges that delays may result in tax revenue losses to the government. It is difficult to quantify income tax losses because individual tax situations vary widely<sup>55</sup> but USCIS estimates the potential loss to other employment tax programs, namely Medicare and social security which have a combined tax rate of 7.65 percent (6.2 percent and 1.45 percent respectively).<sup>56</sup> With both the employee and employer not paying their respective portion of Medicare and social security taxes, the total estimated tax loss for Medicare and social security is 15.3 percent.<sup>57</sup> Lost wages ranging from \$255.88 million to \$774.76 million would result in employment tax losses to the government ranging from \$39.15 million to \$118.54 million.<sup>58</sup> Again,

losses = 15.3 percent total estimated tax loss to government.

<sup>55</sup> Calculations: Lower bound lost wages \$255.88 million × 15.3 percent employee tax rate = \$39.15 million.

Upper bound lost wages \$774.76 million × 15.3 percent employee tax rate = \$118.54 million.

<sup>54</sup> Calculations: 2,655,429 lost working days \* (\$96.36 per day) = \$255.88 million; 2,655,429 lost working days \* (\$291.77 per day) = \$774.76 million.

<sup>55</sup> See More than 44 percent of Americans pay no federal income tax (September 16, 2018) available at <https://www.marketwatch.com/story/81-million-americans-wont-pay-any-federal-income-taxes-this-year-heres-why-2018-04-16>.

<sup>56</sup> The various employment taxes are discussed in more detail at <https://www.irs.gov/businesses/small-businesses-self-employed/understanding-employment-taxes>. See IRS Publication 15, Circular E, Employer's Tax Guide for specific information on employment tax rates. [https://www.irs.gov/pub/irs-pdf/p15\\_18.pdf](https://www.irs.gov/pub/irs-pdf/p15_18.pdf).

<sup>57</sup> Calculation: (6.2 Percent social security + 1.45 percent Medicare) × 2 employee and employer

depending on the circumstances of the employee, there could be additional federal income tax losses not estimated here. There may also be state and local income tax losses that would vary according to the jurisdiction.

In addition to taxes, USCIS also considered the effects of this rule on USCIS resources. In response to the *Rosario v. USCIS* litigation and to comply with the court order, USCIS has dedicated as many resources as practicable to adjudications of initial EAD applications for pending asylum applicants, but continues to face a historic asylum application backlog, which in turn increases the numbers of applicants eligible for pending asylum EADs. However, this reallocation of resources is not a long-term, sustainable solution because USCIS has many competing priorities and many time-sensitive adjudication timeframes. Reallocating resources in the long-term is not sustainable due to work priorities in other product lines. Hiring more officers could bring improvements but that would not immediately shorten adjudication timeframes because additional time would be required to onboard new employees, and train them. In addition, there is currently no fee for asylum applications or the corresponding initial EAD applications, and the cost of adjudication is covered by fees paid by other benefit requesters. USCIS is uncertain of the actual cost impacts of hiring additional adjudicators to process these EAD applications at this time. Finally, USCIS has found that certain applications inherently cannot be processed in a specific number of days due to vetting procedures and background checks that simply require additional time (see Table 10 where processing days in FY 2017 reached a maximum 810 days). Therefore, meeting the 30-day timeframe does not solely depend on hiring more adjudication officers because for certain applications additional time is needed for processing. Thus, USCIS is proposing to remove the 30-day requirement rather than increasing the number of adjudication officers in the long-term.

This proposed rule would result in reduced opportunity costs to the Federal Government. Since *Rosario* compelled USCIS to comply with the 30-day provision in FY 2018, USCIS has redistributed its adjudication resources to work up to full compliance. If the 30-day timeframe is removed, these redistributed resources could be reallocated, potentially reducing delays in processing of other applications and avoiding costs associated with hiring

additional employees. USCIS has not estimated these avoided costs.

DHS also acknowledges the distributional impacts associated with an applicant waiting for an EAD onto the applicant's support network. DHS assumes the longer an asylum applicant's EAD is delayed, the longer the applicant's support network is providing assistance to the applicant. DHS cannot determine how much monetary or other assistance is provided to such applicants. DHS requests comments from the public on any data or sources that demonstrate the amount or level of assistance provided to asylum applicants who have pending EAD applications. DHS welcomes any comments from the public on costs to applicants from removing the 30-day adjudication timeframe.

USCIS does not anticipate that removing the separate 90-day EAD filing requirement would result in any costs to applicants or the Federal Government, as it makes a procedural change that benefits the applicant. DHS also welcomes public comments on any costs resulting from the removal of the 90-day renewal requirement.

## (2) Benefits

By eliminating the 30-day provision, DHS would be able to operate under long-term sustainable case processing times for initial EAD applications for pending asylum applicants, to allow sufficient time to address national security and fraud concerns, and to maintain technological advances in document production and identity verification that USCIS must fulfill as a part of its core mission within DHS. Applicants would rely on up-to-date processing times, which provide realistic expectations of adjudication times.

This rule would end future litigation over the 30-day adjudication timeframe, such as the litigation referenced above. Even applications that are not subject to a set timeframe, however, could in some cases be the subject of litigation on "unreasonable delay" theories. And more important, as indicated above, as a primary goal, USCIS seeks to adequately vet applicants and adjudicate applications as quickly and efficiently as possible. DHS welcomes any public comments on the benefits described for the removal of the 30-day adjudication timeframe.

USCIS would benefit from the removal of the 90-day renewal requirement, because regulations would be updated to match that of other EAD categories and it would ensure that the regulatory text reflects current DHS policy and regulations under DHS's

2017 AC21 Rule. USCIS welcomes any public comment on the benefits of the removal of the 90-day renewal requirement.

## (3) Labor Market Overview

As discussed in the population section of this analysis, USCIS anticipates receiving approximately 478,721 Form I-765 applications annually from pending asylum applicants with an estimated 261,782 initial applications and 212,255 renewal applications. Since this proposed rule would only affect initial applicants who experience potential delays in processing, USCIS estimates the affected population to be approximately 119,088 applications.<sup>59</sup> The U.S. labor force consists of a total of 162,981,000 workers, according to the recent data (June 2019).<sup>60</sup> Therefore, the population affected by this proposed rule represents 0.07 percent of the U.S. labor force, suggesting that the number of potential workers no longer expecting a 30-day processing timeframe make up a very small percentage of the U.S. labor market.<sup>61</sup> USCIS recognizes that unemployment rates have been historically low recently and the number of unemployed persons was 5,975,000 in June 2019, and so providing EADs to pending asylum applicants potentially fills an economic need as discussed previously.<sup>62</sup> However, USCIS must first be sufficiently assured of applicant eligibility and ensure all background and security checks are completed.

In any case, USCIS notes that this proposed rule does not introduce any newly eligible workers into the labor force, or permanently prevent any eligible workers from joining the labor force. This proposed rule only amends the processing of initial and renewal employment authorizations for pending asylum applicants. The ability of pending asylum applicants to be eligible for requesting employment authorization in certain circumstances is in existing regulations; this proposed

<sup>59</sup> In FY 2017, USCIS adjudicated 119,088 approved applications past the regulatory set timeframe.

<sup>60</sup> The BLS labor force data are found in Table A-1. Employment status of the civilian population by sex and age, seasonally adjusted, from the Current Population Survey July 2019 News Release: [https://www.bls.gov/news.release/archives/empsit\\_07052019.pdf](https://www.bls.gov/news.release/archives/empsit_07052019.pdf).

<sup>61</sup> Calculation: (119,088 approximate initial applicants who could experience processing delays per year/162,981,000 workers) \* 100 = 0.07 percent.

<sup>62</sup> The BLS labor force data are found in Table A-1. Employment status of the civilian population by sex and age, seasonally adjusted, from the Current Population Survey July 2019 News Release: [https://www.bls.gov/news.release/archives/empsit\\_07052019.pdf](https://www.bls.gov/news.release/archives/empsit_07052019.pdf).

rulemaking is not seeking to alter which pending asylum applicants are eligible to apply for employment authorization. Therefore, this proposed rule would not change the composition of the population of 229,911 estimated applicants who may apply for employment authorization or the number of workers entering the labor force; rather, this rule could delay 119,088 pending asylum applicants from entering the U.S. labor market by an average of approximately 31 days each, for a total of 3,651,326 days.<sup>63</sup> DHS welcomes public comment on this assessment of this proposed rule.

#### (4) Alternatives

##### (1) Alternative: 90-Day Regulatory Timeframe

DHS considered an alternative to the proposed removal of the 30-day regulatory timeframe, to instead extend the regulatory timeframe to 90 days. Currently, under the *Rosario v. USCIS* court order, USCIS must comply with its existing regulation requiring a 30-day timeframe and process all initial EAD applications for asylum applicants within 30 days. Under this alternative, USCIS would instead process all future applications within 90 days. In FY 2017, prior to the *Rosario v. USCIS* court

order, USCIS was able to sustainably process approximately 47 percent of applications within 30 days. USCIS, therefore, assumes 47 percent of applicants would remain unaffected under this 90-day alternative. USCIS assumes the remaining 53 percent of applicants would have their processing time extended under this alternative. In FY 2017 there were a total of 119,088 approved applications for which processing took more than 30 days. USCIS assumes approved applications that were processed in 31–60 days, and 61–90 days in FY 2017 (71,556 and 31,356 applicants, respectively) would be processed in a similar amount of time under this alternative. For the 16,176 approved applications that took more than 90 days to process in FY 2017, USCIS assumes the processing time under this alternative would be 90 days, as this alternative would set the maximum processing time at 90 days. USCIS notes that while processing for this group under the 90-day alternative would be longer than the current 30-day processing time under the *Rosario v. USCIS* court order, it would be shorter as compared to the proposed rule, which proposes to remove any processing timeframe.<sup>64</sup>

Based on the analysis provided in the Transfers and Costs section, USCIS used FY 2017 daily processing data to estimate lost wages, lost taxes, and other benefits for this alternative proposal. In FY 2017, USCIS adjudicated 102,912 approved applications<sup>65</sup> between 31 and 90 days. USCIS estimates that under this alternative the 102,912 approved EAD applicants would have experienced an estimated total 1,684,194 lost working days, and lost compensation could have ranged from \$158.82 million to \$480.89 million<sup>66</sup> annually depending on the wages the asylum applicant would have earned. In FY 2017, USCIS adjudicated 16,176 approved applications in greater than 90 days. USCIS estimates that under this alternative the 16,176 approved EAD applicants would have experienced an estimated total 679,392 lost working days, and lost compensation could have ranged from \$65.47 million to \$198.23 million annually depending on the wages the asylum applicants would have earned. Table 11 shows the number of approved applications completed in more than 30 days in FY 2017, the associated number of lost working days, and an estimate of the resulting lost compensation.

TABLE 11—SUMMARY OF CALCULATIONS FOR INITIAL FORM I-765 FOR PENDING ASYLUM APPLICANTS IN FY 2017

	31–60 Days	61–90 Days	Greater than 90 days	Total
FY 2017 Completions .....	71,556	31,356	16,176	119,088
Lost Calendar Days .....	899,402	1,377,308	970,560	3,247,270
Lost Working Days .....	691,314	992,880	679,392	2,377,451
Lost Compensation (lower bound) .....	\$66,615,017	\$95,673,917	\$65,466,213	\$227,755,147
Lost Compensation (upper bound) .....	\$201,702,197	\$289,689,023	\$198,223,758	\$689,614,978

Source: USCIS analysis.

**Note:** The prevailing minimum wage is used to calculate the lower bound while a national average wage is used to calculate the upper bound lost compensation.

In addition to the lost wages, USCIS acknowledges that such processing delays may result in the loss in tax revenue to the government. Similar to the analysis in the Transfers and Costs section, USCIS estimates the potential loss to Medicare and social security. Lost wages ranging \$227.76 million to \$689.61 million would result in employment tax revenue losses to the government ranging from \$34.85 million to \$105.51 million annually.<sup>67</sup> Again, depending on the circumstances of the

employee, there could be additional federal income tax losses not estimated here. There may also be state and local income tax losses that would vary according to the jurisdiction. The ten-year total discounted lost compensation to asylum applicants at 3 percent could range from \$1,942.80 million to \$5,882.56 million and at 7 percent could range from \$1,599.66 million to \$4,843.57 million (years 2019–2028). USCIS recognizes that the impacts of this alternative could be overstated if

the provisions in the broader asylum EAD NPRM are finalized as proposed. Specifically, the broader asylum EAD NPRM would limit or delay eligibility for employment authorization for certain asylum applicants. Accordingly, if the population of aliens is less than estimated as a result of the broader asylum EAD rule, the estimated impacts of this alternative could be overstated because the population affected may be lower than estimated in this rule.

<sup>63</sup> Calculation: 3,654,326 total days/119,088 applicants = 31 days (rounded).

<sup>64</sup> In FY 2017, USCIS adjudicated 16,176 approved and 5,202 denied (c)(8) EAD applications in over 90 days.

<sup>65</sup> In FY 2017, USCIS adjudicated 10,658 denied (c)(8) EAD applications between 31 and 90 days.

Since denied applicants would not obtain work authorization and would not lose working days, this population is not impacted by this proposed rule and are therefore not included in the analysis for lost compensation.

<sup>66</sup> Calculations: 1,648,194 lost working days \* (\$96.36 per day) = \$158.82 million; 1,648,194 lost working days \* (\$291.77 per day) = \$480.89 million.

<sup>67</sup> Calculations: Lower bound lost wages \$227.76 million × 15.3 percent employee tax rate = \$34.85 million.

Upper bound lost wages \$689.61 million × 15.3 percent employee tax rate = \$105.51 million.



As previously discussed, USCIS does not know the portion of overall impacts of this rule that are transfers or costs, but estimates that the maximum monetized impact of this 90-day alternative from lost compensation is \$689.61 million annually. Accordingly, if companies are unable to find reasonable labor substitutes for the position the asylum applicant would have filled then \$689.61 million is the estimated maximum monetized cost of the rule and \$0 is the estimated minimum in monetized transfers. Additionally, under this scenario, there would be a reduction of \$105.51 million in employment tax transfers from companies and employees to the Federal Government. Conversely, if all companies are able to easily find

reasonable labor substitutes, they will bear little or no costs, so \$689.61 million will be transferred from asylum applicants to workers currently in the labor force or induced back into the labor force (we assume no tax losses as a labor substitute was found).

#### (2) Comparison of Alternatives

Currently, the *Rosario v. USCIS* court decision requires USCIS to process asylum EAD applications in 30 days. This rule proposes to remove any adjudication timeframe for processing future asylum EAD applications. USCIS also considered an alternative under which USCIS would process all future applications within 90 days. In the table below, USCIS compares the lost working days and associated lost compensation and taxes under the 90-

day alternative with the proposed rule. As previously discussed, if companies can find replacement labor for the position the asylum applicant would have filled, the effects of this rule would be primarily transfers from asylum applicants to others already in the labor market (or induced to return). If companies cannot find reasonable substitutes, the rule would primarily be a cost to these companies through lost productivity and profits, and also result in a decrease in employment tax transfers from employees to the government. USCIS uses the lost compensation to asylum applicants as a measure of the overall impact of the rule—either as distribution impacts (transfers) or as a proxy for businesses' cost for lost productivity.

TABLE 12—COMPARISON OF ALTERNATIVES, USING FY 2017 ANNUAL DATA

	Number of applicants impacted by change (FY 2017)	Lost working days	Lost compensation (lower bound)	Lost compensation (upper bound)	Lost employment taxes when replacement labor is not found (lower bound)	Lost employment taxes when replacement labor is not found (upper bound)
Current 30-day Processing Timeframe (i.e., no action baseline) .....	N/A	N/A	N/A	N/A	N/A	N/A
90-day Adjudication Timeframe Alternative .....	119,088	2,377,451	\$227,755,147	\$689,614,978	\$34,846,537	\$105,511,092
No Adjudication Timeframe (i.e., Proposed Alternative) .....	119,088	2,655,429	255,877,138	774,764,960	39,149,202	118,539,039

Source: USCIS analysis.

The distribution of existing government resources would vary under the baseline, the proposed rule, and the 90-day alternative. When *Rosario* compelled USCIS to comply with the 30-day provision in FY 2018 (the baseline), USCIS redistributed its adjudication resources to work up to full compliance. If the 30-day timeframe is removed (the proposed rule), all of these redistributed resources could be reallocated back to the way they were pre-*Rosario* (which USCIS assumes will look like FY 2017). Under the 90-day alternative, some of the resources could be moved back, but not all of them because in FY 2017 USCIS was able to adjudicate 92 percent of applicants in 90 days.

DHS decided not to propose the 90-day alternative because although it would provide USCIS with more time to adjudicate initial EAD applications from pending asylum applicants and applicants with a new expected timeframe, it would not provide USCIS with the certainty and flexibility it needs to fulfill its core mission. Further, under DHS's final 2017 AC21 Rule,

USCIS removed the 90-day timeframe for all other EAD categories. Maintaining any adjudication timeframe for this EAD would unnecessarily constrict adjudication workflows. Ultimately, USCIS is unable to plan its workload and staffing needs with the level of certainty that a binding timeframe may require, and has no way of predicting what national security and fraud concerns may be or what procedures would be necessary in the future. DHS therefore declined to adopt a 90-day regulatory timeframe, which would unnecessarily place operational constraints on adjudicators.

#### B. Regulatory Flexibility Act

The Regulatory Flexibility Act of 1980 (RFA), 5 U.S.C. 601–612, as amended by the Small Business Regulatory Enforcement Fairness Act of 1996, Public Law 104–121 (March 29, 1996), requires federal agencies to consider the potential impact of regulations on small entities during the development of their rules. The term “small entities” refers to small businesses, not-for-profit organizations that are not dominant in their fields, and governmental

jurisdictions with populations of less than 50,000. This proposed rule would continue to provide employment authorization to asylum applicants who voluntarily apply for such benefits. This proposed rule only removes the 30-day adjudication timeframe and the corresponding 90-day renewal requirement. For the purposes of the RFA, DHS estimates that approximately 119,088 individuals may be impacted by this proposed rule annually. Individuals are not considered by the RFA to be a small entity. As previously explained, this proposed rule may result in lost compensation for some initial applicants whose EAD processing is delayed beyond the 30-day regulatory timeframe. However, the proposed rule does not directly regulate employers.

The RFA does not require agencies to examine the impact of indirect costs to small entities. Regardless, DHS is unable to identify the next best alternative to hiring a pending asylum applicant and is therefore unable to reliably estimate the potential indirect costs to small entities from this proposed rule.



DHS requests comments from the public that would assist in understanding costs not described herein. An initial regulatory flexibility analysis follows.

(1) A description of the reasons why the action by the agency is being considered.

This proposed rule would remove the 30-day regulatory timeframe for the adjudication of initial EAD applications by pending asylum applicants because it is outdated, does not account for the recent volume of applications and no longer reflects current operations. The proposed rule would also make a technical change to remove the 90-day filing requirement to reduce confusion regarding EAD renewal requirements for pending asylum applicants and ensure the regulatory text reflects current DHS policy and regulations under DHS's final 2017 AC21 Rule.

(2) A succinct statement of the objectives of, and legal basis for, the proposed rule.

The authority of the Secretary of Homeland Security (Secretary) for these regulatory amendments is found in various sections of the Immigration and Nationality Act (INA), 8 U.S.C. 1101 *et seq.*, and the Homeland Security Act of 2002 (HSA), Public Law 107–296, 116 Stat. 2135, 6 U.S.C. 101 *et seq.* General authority for issuing the proposed rule is found in section 103(a) of the INA, 8 U.S.C. 1103(a), which authorizes the Secretary to administer and enforce the immigration and nationality laws and to establish such regulations as she deems necessary for carrying out such authority. Further authority for the regulatory amendment in the final rule is found in section 208(d)(2) of the INA, 8 U.S.C. 1158(d)(2), which states an applicant for asylum is not entitled to employment authorization, and may not be granted asylum application-based employment authorization prior to 180 days after filing of the application for asylum, but otherwise authorizes the Secretary to prescribe by regulation the terms and conditions of employment authorization for asylum applicants.

The proposed rule would remove the 30-day adjudication timeframe in order to better align with DHS processing times achieved in FY 2017, reduce confusion regarding EAD renewal requirements and ensure the regulatory text reflects current DHS policy and regulations under DHS's final 2017 AC21 Rule.

(3) A description of and, where feasible, an estimate of the number of small entities to which the proposed rule will apply.

This proposed rule would directly regulate pending asylum applicants, or

individuals, applying for work authorization. However, DHS presents this IRFA as the proposed rule may indirectly impact small entities who incur opportunity costs by having to choose the next best alternative to immediately filling the job the asylum applicant would have filled. DHS cannot reliably estimate how many small entities may be indirectly impacted as a result of this proposed rule, but DHS believes the number of small entities directly regulated by this rule is zero.

(4) A description of the projected reporting, recordkeeping, and other compliance requirements of the proposed rule, including an estimate of the classes of small entities which will be subject to the requirement and the type of professional skills necessary for preparation of the report or record.

This rule would not directly impose any reporting, recordkeeping, or other compliance requirements on small entities. Additionally, this rule would not require any additional professional skills.

(5) Identification, to the extent practicable, of all relevant federal rules that may duplicate, overlap or conflict with the proposed rule.

DHS is unaware of any relevant federal rule that may duplicate, overlap, or conflict with the proposed rule. Elsewhere in this preamble, DHS notes that notwithstanding the language of the parallel DOJ regulations in 8 CFR 1208.7, as of the effective date of a final rule, the revised language of 8 CFR 208.7(a)(1) and removal of 8 CFR 208.7(d) would be binding on DHS and its adjudications. DHS would not be bound by the 30-day provision of the DOJ regulations at 8 CFR 1208.7(a)(1). DOJ has no authority to adjudicate employment authorization applications. DHS has been in consultation with DOJ on this proposed rule, and DOJ may issue conforming changes at a later date.

(6) Description of any significant alternatives to the proposed rule which accomplish the stated objectives of applicable statutes and which minimize any significant economic impact of the proposed rule on small entities.

DHS is not aware of any alternatives to the proposed rule that accomplish the stated objectives and that would minimize the economic impact of the proposed rule on small entities as this rule imposes no direct costs on small entities. DHS requests comments and seeks alternatives from the public that will accomplish the same objectives.

#### C. Congressional Review Act

This proposed rule is a major rule, as defined by 5 U.S.C. 804. Accordingly,

absent exceptional circumstances, this rule, if enacted as a final rule, would be effective at least 60 days after the date on which Congress receives a report submitted by DHS under the Congressional Review Act, or 60 days after the final rule's publication, whichever is later.

#### D. Unfunded Mandates Reform Act of 1995

The Unfunded Mandates Reform Act of 1995 (UMRA) requires each federal agency to prepare a written statement assessing the effects of any federal mandate in a proposed or final agency rule that may result in a \$100 million or more expenditure (adjusted annually for inflation) in any one year by state, local, and tribal governments, in the aggregate, or by the private sector. The value equivalent of \$100 million in 1995, adjusted for inflation to 2018 levels by the Consumer Price Index for All Urban Consumers (CPI-U), is \$165 million.

Some private sector entities may incur a cost, as they could be losing the productivity and potential profits the asylum applicant could have provided had the asylum applicant been in the labor force earlier. Entities may also incur opportunity costs by having to choose the next best alternative to immediately filling the job the asylum applicant would have filled. In such instances, USCIS does not know if or to what extent this would impact the private sector, but assesses that such impacts would result indirectly from delays in employment authorization, and would not be a consequence of an enforceable duty. As a result, such costs would not be attributable to a mandate under UMRA. See 2 U.S.C. 658(6), (7) (defining a federal private sector mandate as, *inter alia*, a regulation that imposes an enforceable duty upon the private sector except for a duty arising from participation in a voluntary Federal program); 2 U.S.C. 1502(1). Similarly, any costs or transfer effects on state and local governments would not result from a mandate under UMRA. See 2 U.S.C. 658 (5), (6) (defining a federal intergovernmental mandate as, *inter alia*, a regulation that imposes an enforceable duty upon State, local, or tribal governments, except for a duty arising from participation in a voluntary Federal program); 2 U.S.C. 1502(1). USCIS nonetheless welcomes public comment on potential UMRA impacts.

#### E. Executive Order 13132 (Federalism)

This proposed rule would not have substantial direct effects on the states, on the relationship between the Federal Government and the states, or on the distribution of power and

responsibilities among the various levels of government. Therefore, in accordance with section 6 of Executive Order 13132 (Federalism), it is determined that this proposed rule does not have sufficient federalism implications to warrant the preparation of a federalism summary impact statement.

#### *F. Executive Order 12988 (Civil Justice Reform)*

This rule meets the applicable standards set forth in sections 3(a) and 3(b)(2) of Executive Order 12988 (Civil Justice Reform).

#### *G. Paperwork Reduction Act*

Under the Paperwork Reduction Act of 1995, Public Law 104–13, all agencies are required to submit to OMB, for review and approval, any reporting requirements inherent in a rule. *See* Public Law 104–13, 109 Stat. 163 (May 22, 1995). This rule does not impose any reporting or recordkeeping requirements under the Paperwork Reduction Act.

#### *H. Family Assessment*

DHS has assessed this action in accordance with section 654 of the Treasury General Appropriations Act, 1999, Public Law 105–277, Div. A. With respect to the criteria specified in section 654(c)(1), DHS has determined that the proposed rule may delay the ability for some initial applicants to work, which could decrease disposable income of families, as the lost compensation to asylum applicants could range from \$255.88 million to \$774.76 million annually depending on the wages the asylum applicant would have earned. For the reasons stated elsewhere in this preamble, however, DHS has determined that the benefits of the action justify the potential financial impact on the family. Further, the potential for lost compensation does not account for the fact that compliance with the 30-day timeframe is not sustainable in the long-term, as DHS has been unable to meet the 30-day processing timeframe in certain cases even with additional adjudication resources.

#### *I. Executive Order 13175*

This proposed rule does not have tribal implications under Executive Order 13175, Consultation and Coordination with Indian Tribal Governments, because it would not have a substantial direct effect on one or more Indian tribes, on the relationship between the Federal Government and Indian tribes, or on the distribution of power and responsibilities between the Federal Government and Indian tribes.

#### *J. National Environmental Policy Act (NEPA)*

DHS Directive (Dir) 023–01 Rev. 01 and Instruction (Inst) 023–01–001 Rev. 1 establish the policies and procedures that DHS and its components use to comply with NEPA and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, 40 CFR parts 1500–1508.

The CEQ regulations allow federal agencies to establish, with CEQ review and concurrence, categories of actions (“categorical exclusions”) which experience has shown do not individually or cumulatively have a significant effect on the human environment and, therefore, do not require an Environmental Assessment (EA) or Environmental Impact Statement (EIS). 40 CFR 1507.3(b)(1)(iii), 1508.4. Inst. 023–01–001 Rev. 01 establishes Categorical Exclusions that DHS has found to have no such effect. Inst. 023–01–001 Rev. 01 Appendix A Table 1. Inst. 023–01–001 Rev. 01 requires the action to satisfy each of the following three conditions: (1) The entire action clearly fits within one or more of the categorical exclusions; (2) the action is not a piece of a larger action; and (3) no extraordinary circumstances exist that create the potential for a significant environmental effect. Dir. 023–01 Rev. 01 section V.B (1)–(3).

This proposed rule would remove the following purely administrative provisions from an existing regulation: (1) The 30-day adjudication provision for EAD applications filed by asylum applicants, and (2) the provision requiring pending asylum applicants to submit Form I–765 renewal applications 90 days before their employment authorization expires. 8 CFR 208.7(a)(1), (d).

Assuming that NEPA applies to this rule at all,<sup>68</sup> this rule falls within categorical exclusions number A3(a) in Inst. 023–01–001 Rev. 01, Appendix A, Table 1: “Promulgation of rules . . . strictly of an administrative or procedural nature” and A3(d) for rules that interpret or amend an existing regulation without changing its environmental effect. This rule is not part of a larger action and presents no extraordinary circumstances creating the potential for significant environmental effects. Therefore, this proposed rule is also categorically excluded from further NEPA review.

<sup>68</sup> DHS reserves its position that NEPA generally does not apply to USCIS rules.

#### *K. National Technology Transfer and Advancement Act*

The National Technology Transfer and Advancement Act (NTTAA) (15 U.S.C. 272 note) directs agencies to use voluntary consensus standards in their regulatory activities unless the agency provides Congress, through OMB, with an explanation of why using these standards would be inconsistent with applicable law or otherwise impractical. Voluntary consensus standards are technical standards (e.g., specifications of materials, performance, design, or operation; test methods; sampling procedures; and related management systems practices) that are developed or adopted by voluntary consensus standard bodies. This proposed rule does not use technical standards. Therefore, we did not consider the use of voluntary consensus standards.

#### *L. Executive Order 12630*

This proposed rule would not cause the taking of private property or otherwise have taking implications under Executive Order 12630, Governmental Actions and Interference with Constitutionally Protected Property Rights.

#### *M. Executive Order 13045: Protection of Children From Environmental Health Risks and Safety Risks*

Executive Order 13045 requires agencies to consider the impacts of environmental health risk or safety risk that may disproportionately affect children. DHS has reviewed this proposed rule and determined that this rule is not a covered regulatory action under Executive Order 13045. Although the rule is economically significant, it would not create an environmental risk to health or risk to safety that might disproportionately affect children. Therefore, DHS has not prepared a statement under this executive order.

#### *N. Executive Order 13211: Actions Concerning Regulations That Significantly Affect Energy Supply, Distribution, or Use*

Executive Order 13211 requires agencies to consider the impact of rules that significantly impact the supply, distribution, and use of energy. DHS has reviewed this proposed rule and determined that this proposed rule would not have a significant adverse effect on the supply, distribution, or use of energy. Therefore, this proposed rule does not require a Statement of Energy Effects under Executive Order 13211.

## V. List of Subjects and Regulatory Amendments

### List of Subjects in 8 CFR Part 208

Administrative practice and procedure, Aliens, Immigration, Reporting and recordkeeping requirements.

Accordingly, DHS proposes to amend part 208 of chapter I of title 8 of the Code of Federal Regulations as follows:

### PART 208—PROCEDURES FOR ASYLUM AND WITHHOLDING OF REMOVAL

■ 1. The authority citation for part 208 continues to read as follows:

**Authority:** 8 U.S.C. 1101, 1103, 1158, 1226, 1252, 1282; Title VII of Public Law 110–229; 8 CFR part 2.

#### § 208.7 [Amended]

■ 2. Amend section 208.7 by:

■ a. In paragraph (a)(1), removing the words “If the asylum application is not so denied, the Service shall have 30 days from the date of filing of the request employment authorization to grant or deny that application, except that no” and adding, in their place, the word “No”;

■ b. In paragraphs (a)(1) and (c)(3), removing the words “the Service” and adding, in their place, the word “USCIS”; and

■ c. Removing paragraph (d).

**Kevin K. McAleenan,**

*Acting Secretary of Homeland Security.*

[FR Doc. 2019–19125 Filed 9–6–19; 8:45 am]

**BILLING CODE 9111–97–P**

## DEPARTMENT OF TRANSPORTATION

### Federal Aviation Administration

#### 14 CFR Part 39

[Docket No. FAA–2019–0675; Product Identifier 2019–NM–068–AD]

RIN 2120–AA64

### Airworthiness Directives; Bombardier, Inc., Airplanes

**AGENCY:** Federal Aviation Administration (FAA), DOT.

**ACTION:** Notice of proposed rulemaking (NPRM).

**SUMMARY:** The FAA proposes to adopt a new airworthiness directive (AD) for certain Bombardier, Inc., Model DHC–8–401 and –402 airplanes. This proposed AD was prompted by a report that certain fuselages were delivered with non-conforming keel tension fittings and stringer end fittings. This

proposed AD would require a detailed visual inspection of stringer end fittings and keel fittings for loose or working fasteners, signs of wear, and corrosion, and repair if necessary; and a general visual inspection of the keel tension fitting and stringer end fittings, as applicable and repairs and replacement of the keel and stringer end fittings if necessary. The FAA is proposing this AD to address the unsafe condition on these products.

**DATES:** The FAA must receive comments on this proposed AD by October 24, 2019.

**ADDRESSES:** You may send comments, using the procedures found in 14 CFR 11.43 and 11.45, by any of the following methods:

**Federal eRulemaking Portal:** Go to <http://www.regulations.gov>. Follow the instructions for submitting comments.

**Fax:** 202–493–2251.

**Mail:** U.S. Department of Transportation, Docket Operations, M–30, West Building Ground Floor, Room W12–140, 1200 New Jersey Avenue SE, Washington, DC 20590.

**Hand Delivery:** Deliver to Mail address above between 9 a.m. and 5 p.m., Monday through Friday, except Federal holidays.

For Bombardier, Inc., service information identified in this NPRM, contact De Havilland Aircraft of Canada Ltd., Q-Series Technical Help Desk, 123 Garratt Boulevard, Toronto, Ontario M3K 1Y5, Canada; phone: 416–375–4000; fax: 416–375–4539; email: [thd@dehavilland.com](mailto:thd@dehavilland.com); internet: <https://dehavilland.com>. You may view this service information at the FAA, Transport Standards Branch, 2200 South 216th St., Des Moines, WA. For information on the availability of this material at the FAA, call 206–231–3195.

#### Examining the AD Docket

You may examine the AD docket on the internet at <http://www.regulations.gov> by searching for and locating Docket No. FAA–2019–0675; or in person at Docket Operations between 9 a.m. and 5 p.m., Monday through Friday, except Federal holidays. The AD docket contains this NPRM, the regulatory evaluation, any comments received, and other information. The street address for Docket Operations is listed above. Comments will be available in the AD docket shortly after receipt.

#### FOR FURTHER INFORMATION CONTACT:

Andrea Jimenez, Aerospace Engineer, Airframe and Propulsion Section, FAA, New York ACO Branch, 1600 Stewart Avenue, Suite 410, Westbury, NY 11590; phone: 516–228–7330; fax: 516–

794–5531; email: [9-avs-nyaco-cos@faa.gov](mailto:9-avs-nyaco-cos@faa.gov).

#### SUPPLEMENTARY INFORMATION:

##### Comments Invited

The FAA invites you to send any written relevant data, views, or arguments about this proposal. Send your comments to an address listed under the **ADDRESSES** section. Include “Docket No. FAA–2019–0675; Product Identifier 2019–NM–068–AD” at the beginning of your comments. The FAA specifically invites comments on the overall regulatory, economic, environmental, and energy aspects of this NPRM. The FAA will consider all comments received by the closing date and may amend this NPRM because of those comments.

The FAA will post all comments received, without change, to <http://www.regulations.gov>, including any personal information you provide. The FAA will also post a report summarizing each substantive verbal contact received about this NPRM.

#### Discussion

Transport Canada Civil Aviation (TCCA), which is the aviation authority for Canada, has issued Canadian AD CF–2019–06, dated February 18, 2019 (referred to after this as the Mandatory Continuing Airworthiness Information, or “the MCAI”), to correct an unsafe condition for certain Bombardier, Inc., Model DHC–8–401 and –402 airplanes. The MCAI states:

A disclosure letter from a supplier identified a number of fuselages that were delivered with non-conforming keel tension fittings and stringer end fittings. Left unaddressed, these non-conformances can lead to premature cracking in several locations, corrosion, and compromise the structural integrity of the fuselage joints.

This [Canadian] AD requires a one-time inspection of the non-conforming fittings [and repair if necessary], and later [an inspection of the fittings and, if necessary,] replacement of the fittings [or repair].

You may examine the MCAI in the AD docket on the internet at <http://www.regulations.gov> by searching for and locating Docket No. FAA–2019–0675.

#### Related Service Information Under 14 CFR Part 51

Bombardier has issued the following service information.

Service Bulletin 84–53–74, dated August 29, 2018. This service information describes procedures for a general visual inspection of the keel and stringer end fittings, repair, and replacement of the keel and stringer end fittings.



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> September 10, 2019
<b>Tracking No.</b> 1k3-9c3r-xxqa
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0002

Comment Submitted by Grant Godfrey, Parker Gallini, LLP

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## Submitter Information

**Name:** Grant Godfrey

**Address:**

460 Totten Pond Road

Suite 350

Waltham, MA, 02451

**Email:** GGodfrey@parkergallini.com

**Phone:** 7818108990

**Organization:** Parker Gallini LLP

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## General Comment

This regulation's analysis of the costs and benefits is a joke. It explicitly refuses to take into account the advantages and costs of hiring additional USCIS officers to meet the deadlines without providing any analysis as to why this is the case. The baseline measurement is also a joke -- it analyzes what things looked like two years ago, before USCIS implemented self-inflicted and legally unjustifiable policies that have dramatically increased processing times. It claims the ability to process 78% of all EADs within 60 days, but does not explain how, in a world where everything filed with USCIS has slowed down, this is possible in a world where I-765s filed along with I-485 applications routinely take anywhere from 5.5 months to 9.5 months.

It's analysis of the lost compensation and taxes is therefore fatally flawed, despite the bare assertions without any proof that this baseline the "best assessment of the way the world would look absent this proposed action." The regulation needs to explain why this is the best assessment and what other assessments are possible and why they are not as good.

The rule also explicitly refuses to factor into its cost analysis "additional costs to businesses for lost profits and opportunity costs or the distributional impacts for those in an applicant's support network."

It then makes the egregious error of assuming there is a scenario out there in which there is a \$0 cost to transfer employees, which is facially ridiculous that all asylum seekers will be easily replaced.

AR001515



Even with these problems, the proposed rule by its own analysis results in NO ACTUAL MONETARY BENEFITS AND LOSSES THAT RANGE FROM APPROXIMATELY \$255 MILLION TO \$900 MILLION PER YEAR.

The coup de grace here though is the total lack of analysis under Executive Order 13771, which states that any regulation MUST result in a net cost of \$0 or be paid for by eliminating other regulations, which this does not do.

This regulation should not have been published given how bad the analysis is.

AR001516

# PUBLIC SUBMISSION

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<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0003

Comment Submitted by Beltran Angarita

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## Submitter Information

**Name:** Beltran Angarita

**Address:**

118 Emily lane

33510

Tampa, FL, 33510

**Email:** beltranangarita@gmail.com

**Phone:** 7864389160

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## General Comment

Saludos Cordiales, se estanca el TPS, y ahora proponen esto, NO estoy de acuerdo. No

AR001517

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0004

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Ohio Needs Immigrants Anonymous

**Address:**

OH, 45246

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## General Comment

Asylum seekers are most vulnerable immigrant population who does not possess other identification documents and is not eligible for any types of benefits and, therefore, it is important to produce their employment card within 30 days of filing. Since USCIS will anyways continue to divert its resources towards the border and CBP/ICE and not towards other forms of legal immigration as it misstated in its statement, it must continue to provide asylum seekers with EAD within 30 days.

AR001518

# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k3-9c3b-168s
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<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0005

Comment Submitted by Edgar Velarde

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## Submitter Information

**Name:** edgar velarde

**Address:**

7271 west 24th ave apt 134  
hialeah, FL, 33016

**Email:** garvepez@gmail.com

**Phone:** 7866813044

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## General Comment

the work permit must be given if and only if the asylum was approved.

AR001519



# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0006

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymus Anonymus

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## General Comment

Crazy

AR001520

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0007

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I OPPOSE this rule. USCIS already fails to process the EADs in 30 days, so removing the provision would destroy any remaining incentive to complete the processing in a timely manner. The failure to estimate the costs of hiring more USCIS officers, while acknowledging that doing so would help address the backlog, shows me how little effort has been put into this proposed rule change. Do your job. EADs are essential to the economic survival of asylum-seekers, who we are legally required and duty bound to receive in this country. They already have to wait an ungodly amount of time before applying for their EADs, and to delay the process any further is a terrible idea.

AR001521

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0008

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Due to the overwhelming evidence of fraud in asylum requests, & due to the fact that US don't & never had offered "economic asylum" & majority of illegal immigrants fall into this category, legally they aren't even entitled to receive a work permit.

I strongly support this USCIS proposal of delay & delay & delay.

I'm upset that people who are paying fees & going through background check from the FBI has to wait longer than immigrants who lied to get in.

AR001522



# PUBLIC SUBMISSION

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<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0009

Comment Submitted by Michael Cochran

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## Submitter Information

**Name:** Michael Cochran

**Address:**

9761 dominican drive  
miami, FL, 33189

**Email:** tecuroutsugi@gmail.com

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## General Comment

I OPPOSE this rule. USCIS already fails to process the EADs in 30 days, or even 90 days when you're renovating the document. The process it's very long and tedious and removing this measurements will make things worst.

AR001523

# PUBLIC SUBMISSION

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<b>Posted:</b> September 18, 2019
<b>Tracking No.</b> 1k3-9c8n-nsy8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0010

Comment Submitted by Vanessa Milbradt

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## Submitter Information

**Name:** Vanessa Milbradt

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## General Comment

As a U.S. citizen and member of society, I am concerned that this change will harm clients, businesses, and communities by further delaying the time an asylum applicant must wait to legally work or get a drivers license while their application is pending. Asylum seekers today face long backlogs in asylum processing, often waiting years after filing the asylum application for an interview and, even later, a decision. This change will burden support systems and charities, make it difficult for small businesses to find workers, and could have broader effects by destabilizing communities.

AR001524

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0011

Comment Submitted by Mr. Blanchard

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## Submitter Information

**Name:** Mr. Blanchard

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## General Comment

I have mixed feelings about this proposal. Yes, I do see the need to expedite legal processes involved with asylum seekers but I think that the solution lies with hiring more officers and not repealing the regulatory provisions of 30 days as it would make the situation worse and not better. The only way I would support the provision is if the USCIS had a documented plan to expand the number of officers to process these applications. The 90 day renewal law needs not changed either as this only backlogs the process even more because as humans we tend to procrastinate and this means that these renewals will be placed on permanent backlog and will never be done or if new regulations are presented will make an impossible backlog unless there is a plan made to hire more officers. If I was a President and this was a vote in Congress, it would get Vetoes by myself.. ...Future President Blanchard (D-PA)

AR001525

# PUBLIC SUBMISSION

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<b>Posted:</b> September 18, 2019
<b>Tracking No.</b> 1k3-9c8o-jixi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0012

Comment Submitted by Julia Bull

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## Submitter Information

**Name:** Julia Bull

**Address:**

6640 missile ave  
Cocoa, FL, 32926

**Email:** deadpoetsrule@gmail.com

**Phone:** 3216156205

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## General Comment

I oppose this rule. It is imperative that we as a nation encourage and allow self sufficiency of asylum seekers. Longer than 30 days has the potential to only create economic desperation resulting in negative consequences to the individuals seeking asylum, their families and the communities in which they reside.

AR001526



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> September 18, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0013

Comment Submitted by April Tansey

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## Submitter Information

**Name:** April Tansey

**Address:** United States,

**Email:** art112@scarletmail.rutgers.edu

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## General Comment

Certain aspects of this proposed rule seem to be beneficial. It is extremely important to consider the safety concerns that coincide with these applications, and in order to consider them, a substantial amount of security checking is entailed. It is also evident that there has been an increased number of people that are applying for asylum and that it is extremely difficult to keep up with the demands that are being asked of USCIS employees. Disposing of the 30-day requirement would absolutely make it easier for all of the applications to be reviewed in their entirety. Although, there are also some negative implications of this ruling that need to be reconsidered. Of course there are costs to employers because they will have to find other people to fill positions that asylum applicants cannot fill. These businesses could possibly be shut down due to the costs. Additionally, there are a great deal of costs that the asylum applicants themselves have to bear. It is imperative to think of these individuals applying for asylum as human beings and their perspective needs to be accounted for. Many of them likely apply for asylum because they are in overwhelming situations in their former countries and a lot of them likely have families that they need to provide for. Eliminating the 30-day requirement for provision could cause immense uneasiness for these individuals. Specifically, not offering an alternative timeline requirement is particularly stressful. These people, who are already in limbo, would be facing a tremendous amount of anxiety due to the uncertainty of when they are going to find out whether or not they were granted asylum. Simply implementing an alternative timeline so that the applicants would have an idea of when a decision would be made could alleviate that stress. I do agree that there are a lot of elements that need to be considered in the application process. However, I believe that the applicants are entitled to at least an estimated length of time that it will take for them to receive a decision on their application.

In terms of the 90-day renewal requirement being eliminated, I agree that is a beneficial ruling. It will eliminate any aspect of confusion that could arise from it and it also reduces pressure on those that have an EAD to make sure they are renewing their applications in a timely manner so that they do not lose their EAD.

AR001527

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> September 18, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0014

Comment Submitted by Eric Wang

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## Submitter Information

**Name:** Eric Wang

**Address:**

100 McAllister Street

San Francisco, CA, 94102

**Email:** eric.wang@uchastings.edu

**Phone:** 5103865123

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## General Comment

The immediate apparent concern in removing the 30 day application timeframe requirement is the possibility and likelihood of applications being unprocessed for a potentially infinite amount of time. The stated purpose is to provide DHS - or rather, USCIS - with enough time to receive, screen, and process applications due to the current backlog and lack of resources available to address the issue. However, by removing the time requirement, applicants will have no guarantee or remedy if their applications are placed in perpetual limbo, and not processed - whether approved or denied - within any reasonable amount of time.

Furthermore, DHS acknowledges that they have not estimated the costs of hiring new officers to address the issue, instead arguing that additional time would be necessary for training new employees or processing certain forms. While that may be true, additional employees would provide a more efficient long term solution in regards to most applications, save the few applications that would require additional time regardless of staffing. Why has DHS not even bothered to do a cost analysis for a concrete solution (hiring more staff, which would also create more jobs for Americans!) to the problem?

Additionally, the stated purpose of removing the time limit is also to free up resources that have been diverted to application processing. However, the complete removal of any timeframe limitation on which applications must be processed does not seem like a logical solution to reach given the stated issues. DHS states: DHS believes that the 30-day timeframe described in 8 CFR 208.7(a)(1) does not provide sufficient flexibility for DHS to meet its core missions of enforcing and administering our immigration laws and enhancing security. An extended deadline would encourage the DHS to process applications in a timely manner while still granting DHS flexibility and sufficient time to adequately vet applicants. In fact, DHS itself states that they adjudicated

AR001528

approximately 78 percent of applications within 60 days. Instead of removing the requirement entirely, it seems that merely extending the approval deadline would address the issues raised by DHS while allowing for a balance between the interests of applicants and the need for DHS to maintain security interests. Again, [i]n FY 2017 USCIS was able to adjudicate 92 percent of applicants in 90 days. DHS states that they did not adopt an extended 90 day deadline because: although it would provide USCIS with more time to adjudicate initial EAD applications from pending asylum applicants and applicants with a new expected timeframe, it would not provide USCIS with the certainty and flexibility it needs to fulfill its core mission. There is however, no stated reason why an even longer deadline - i.e. 120 days - would not be acceptable to DHS. There is also no explanation or detail behind the reasoning: it would not provide USCIS with the certainty and flexibility it needs to fulfill its core mission. So then, how long is required by DHS to fulfill its core mission? Apparently, an infinite amount of time according to this proposal.

USCIS estimates that removal of the requirement may result in employment tax losses to the government ranging from \$39.15 million to \$118.54 million with the \$118.54 million as the maximum decrease in employment tax. Qualitative benefits of removing the limit boil down to freeing up resources USCIS has allocated to expediting application processing to meet the 30 day requirement and nothing more. These benefits and goals are achievable with a mere extension of the deadline, and DHS has provided no evidence to the contrary. While the future potential losses of tax revenue to the Federal Government are clearly not a source of current funding to DHS, it again seems more efficient to simply hire more agents to assist in processing applications, which DHS has itself acknowledged would assist in addressing the issue. So, given the acknowledged potential losses of millions of dollars in tax revenue to the government (Tables 2 & 3 in "Costs and Benefits") what then is the benefit of this rule change?

The benefits, according to Table 1, would be "Quantitative: Not estimated." "Qualitative: DHS would be able to operate under long-term sustainable case processing times. . . . without having to add any resources." "This rule would result in reduced opportunity costs to the Federal Government. . . USCIS could reallocate the resources it redistributed to comply with the 30-day provision, potentially reducing delays in processing of other applications and avoiding costs associated with hiring additional employees." So, the rationale for this rule change which would likely result in millions of dollars of revenue loss, is to avoid spending money hiring new employees.

This proposal appears to be poorly prepared and poorly thought out, and is a pale attempt at justifying a purely political goal.

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0015

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Rebecca Johnston

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## General Comment

I oppose this inhumane and economically destructive proposal. DHS should work to comply with existing law and federal court order and process asylum employment applications within 30 days. Six months is already far too long to have to wait to gain work authorization. Eliminating the 30-day rule would remove any incentive for DHS to process authorizations in a timely manner. The lack of any alternative maximum processing time is particularly disturbing. Preventing asylum seekers who want to gain legal authorization to work in the United States robs them of the opportunity to gain self-sufficiency and seek occupations that could be both fulfilling and productive for the US economy. If the problem that DHS currently has in processing these applications is inadequate staffing, then the budget for such staffing should be increased.

AR001530



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**Docket:** USCIS-2018-0001

## Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

## Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0016

Comment Submitted by E. Diaz

## Submitter Information

**Name:** E Diaz

## General Comment

I support this rule, as a person who services a community of different categories of immigrants with filling documents, I see an extreme abuse and fraud by applicants trying to obtain asylum, these applications should be given no shorter than 90 days to process. Other immigrants wait for 6 or more months to have their applications approved and they have the same needs as asylum seekers. In order to curtail the fraud in qualifying for asylum, applications need to be revised more carefully.

AR001531

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0017

Comment Submitted by Leminyer Zapata

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## Submitter Information

**Name:** Leminyer Zapata

**Address:**

Miami, FL, 33165

**Email:** leminyerezapata@gmail.com

**Phone:** 7862417035

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## General Comment

Most of asylum applicants came to this country fleeing persecution. I was one of them in the past, I personally believe that rules like this one are not only discriminatory but also inhuman; this great nation became my home, but is really sad to watch how the country which I consider my new home is being divided. I beg you to put yourself in the situation of a family who does not have enough money to feed their child, that cannot work or does not have how to pay the rent and came asking for protection, is our duty as citizens of this nation, stand up for what is right, and believe me, what you are doing now is not. I hope the agency will reconsider what is doing and God will lead you to help others, you will see how grateful can be a refugee or asylees when someone gave him a new opportunity to LIVE.

AR001532

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0018

Comment Submitted by Ronald Rosales

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## Submitter Information

**Name:** Ronald Rosales

**Address:**

8216SW. 29 st  
Miramar, FL, 33025

**Email:** ronaldrosales69@hotmail.com

**Phone:** 9543217865

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## General Comment

It is not a good measure since the person who applies for the first time the EAD, in this country the bills do not wait and extends that approval time means to avoid covering the expenses of all the people who need the EAD to work legally

AR001533

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0019

Comment Submitted by John Smith

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## Submitter Information

**Name:** John Smith

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## General Comment

Recently I have known a person who was an asylum applicant. He was running away from a political persecution from his home country. He was so miserable due to this current regulation that he cannot even get a drivers license, work and even open a bank account since he has to wait at least 150 days before even to apply for an EAD, SSN etc. We all know in this day and age how one would be very miserable without even a basic drivers license. He had bought a cheap old car, still none of car insurance companies did not offer him a coverage since he did not possess a US license. Had minor accident, then got into trouble for driving without an insurance. I do not think it should be a way to treat people. You should treat people with dignity and respect, not to force them to get into trouble with law. Under these draconian regulations, at least he could foresee that after 180 days he could start normalizing his life. Under current regulations an asylum applicant is subject to 150 days of waiting period before even being eligible to apply for a work permit. After that, government takes additional 30 days to process an EAD. This provision effectively forces these applicants to either work illegally or being dependent to their US family, friends, non-profits, government entities in other word become a public charge during this 6 months period. Certainly government can screen, vet these applicants during this 150 plus 30 days, since it's clear that an asylum applicant would likely apply for and EAD unless one wants to continue to be a public charge or work illegally. To prevent this problem government should consider giving every asylum applicant an option of temporary work permit which can be cancelled if any red flags are found during further screening of the individual applicant. This would prevent an asylum applicant from having to work illegally. In addition it's clear that the government is losing a tax revenue from these workers during this 150 plus 30 days. Employers are also losing the some labor force as well. DHS detailed analysis confirms that in table 1. "Lost wages ranging from \$255.88 million to \$774.76 million would result in employment tax losses to the government ranging from \$39.15 million to \$118.54 million" Interestingly there is no clear quantitative benefit of this proposed provision even in government's analysis. Only benefit has been worded vaguely as "Qualitative: DHS would be able to operate under long-term sustainable case processing times for initial EAD applications for pending asylum applicants, to allow sufficient

AR001534



time to address national security and fraud concerns, and to maintain technological advances in document production and identity verification without having to add any resources." Certainly in the current digital age screening and national security concerns can be addressed much faster than when these original provisions has been enacted more than 20 years ago. Possible benefits provided in this proposal lacks granularity, and lacks details how DHS would be able to achieve those goals by this proposed changes. Purpose of this proposal has been declared as to ensure USCIS has sufficient time to receive, screen, and process applications for an initial grant of employment authorization based on a pending asylum application. It is unclear how this proposal will produce the intended effect, since USCIS already has 150 days plus 30 days in their disposal prior to any asylum applicant applies for an EAD. If DHS does not have enough workforce to deal with more important aspects of their work, as a suggestion maybe all asylum applicants should be given an option of temporary work permit at the time of initial application. This could be cancelled or withdrawn any time during the case progression, interview process or pending stage etc. if any concerning information becomes available for the applicant. Giving an option of temporary work permit would eliminate the application for an EAD completely and lighten the work burden of DHS so they can focus on more important aspect of their jobs. Another potential harm of this provision would be it gives the government unlimited power in terms of how to apply the rule. Regardless of the parties unlimited power is troublesome from a law standpoint. Certainly this provision looks to be a weak one from several fronts from a law standpoint and appears to be an attempt to reverse Rosario vs. USCIS. It is very doubtful that courts will look at an attempt favorable which is trying reverse the previous ruling through a regulatory process. DHS should consider giving early work permits, not late. Benefits of introducing asylum applicants into the labor force far outweigh the costs. Tax benefits, employer benefits, labor force benefits, decreasing the dependency of this subgroup of population and preventing them to become a public charge is surprisingly well documented in the proposed provision detailed analysis.

AR001535

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0020

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

In the current economy with historically low unemployment rates and increasing wages it's hard to find a worker from an employer's standpoint. It is more likely than not that an employer would not be able to fill the vacancy created by not employing asylum applicant which would lead to lost productivity, forced overpay and lost tax revenue.

If an asylum applicant has a family how is he suppose to work and take care of his family without a work permit? A person without a work permit and a job can potentially be criminalized.

Asylum laws is already present in our immigration laws. I think every civilized country in the world have similar laws. Just because there is some alleged fraud your shouldnt change regulations to make life miserable for the rest of authentic asylum applicants. You just cannot admit the people and make life unlivable for them and force them to work illegally or become a public charge. Government should treat people fairly.

AR001536

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0021

Comment Submitted by Caitlin Steinke

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## Submitter Information

**Name:** Caitlin Steinke

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## General Comment

I strongly oppose this proposal. Asylum applicants already have to wait 150 days before they are eligible to apply for work authorization. Removing the 30-day rule eradicates any incentive USCIS has to timely process these applications and grant work authorization to those asylum applicants who qualify. This proposal does not adequately explain why USCIS is unable to adjudicate employment authorization applications within 30 days. The reliance on "fraud" as the catch-all justification for every change that undermines the strength of this country's asylum program is tiresome. If USCIS does not have the resources to timely adjudicate the initial work permit applications of asylum applicants, who are simply attempting to gain lawful authorization to obtain employment and support themselves and their families legally, then the agency's staffing budget should be increased. Because this proposal does not provide for an alternative time constraint within which USCIS must adjudicate these applications, it is setting up asylum applicants to be without lawful work authorization indefinitely. Creating an indefinite period of the inability to work lawfully would be especially devastating because most asylum applicants wait several years for a final decision on their asylum claims, due to the incredible backlog in the nation's asylum offices and immigration courts. When viewing this proposal within the context of all the other attacks on our asylum laws and policies within the past few years, it becomes clear that the true intent of this proposal is to serve as yet another inhumane deterrent for asylum seekers wishing to seek protection in the United States. This proposal is unnecessary and cruel.

AR001537

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0022

Comment Submitted by Michael Jose

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## Submitter Information

**Name:** Michael Jose

**Address:**

2 Tallwood Road  
Augusta, ME, 04330

**Email:** mjjose@protonmail.com

**Phone:** 2074586997

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## General Comment

I support the proposed regulation Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications (Federal Register 2019-19125).

Under the current system, there are too many incentives to file false asylum claims in order to stay in the United States while the government works through the backlog. Removing the guarantee of a work permit within one year (which is the effect of the current policy) would reduce these incentives. It would also force refugee and asylum resettlement agencies to support people making asylum claims, giving them less incentive to work to resettle people who have dubious claims.

Currently they have every reason to want as many asylum claims as possible, both legitimate and bogus.

AR001538



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0023

Comment Submitted by Matthew Olsman, Law office of Matthew J. Olsman

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## Submitter Information

**Name:** Matthew Olsman

**Address:**

870 Market St

Suite 943

San Francisco, California, 94102

**Email:** matthew.olsman@gmail.com

**Phone:** 8183084068

**Organization:** Law office of Matthew J Olsman

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## General Comment

USCIS-2018-0001

USCIS should not institute this rule change. Asylum applicants have to wait 5 months before they even can apply for work permission, so many applicants are destitute. Given the lengthy delays in adjudicating asylum applications, failure to process their EAD applications quickly result in a chilling effect on asylum applicants.

DHS should be able to process these applications in 30 days. They are short applications and are imperative to keeping asylum applicants able to survive while their applications are pending.

AR001539

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0024

Comment Submitted by Maureen Porras, Church World Service (CWS)

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## Submitter Information

**Name:** Maureen Porras

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## General Comment

See attached file(s)

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## Attachments

Church World Service

AR001540

**Church World Service's Comments on the  
Proposal to Change Processing of Work Authorization Requests by Asylum Applicants**

Church World Service (CWS) respectfully submits these comments in opposition to the Department of Homeland Security's (DHS) proposal to change the processing of employment authorization documents (EADs) filed by asylum applicants.

CWS, founded in 1946, is a non-profit organization dedicated to promoting global community development through programs and partner organizations worldwide that support sustainable social and economic development. CWS is also dedicated to assisting vulnerable immigrant populations through our internationally-recognized Immigration and Refugee Program (IRP). IRP is comprised of several departments that assist refugees and immigrants through our cooperative agreements with the U.S. Citizenship and Immigration Services (USCIS), the U.S. Department of State (DOS), and the Office of Refugee Resettlement (ORR).

As part of our cooperative agreements with DOS and USCIS, CWS has assisted in resettling nearly half a million refugees and over seventy-thousand Cuban and Haitian entrants. IRP's legal component provides legal services to low income immigrants through our network of over twenty-one legal departments and affiliates located throughout the United States. Our legal departments consist of attorneys and accredited representatives that assist in providing immigration services at little to no cost to low income immigrants through various grants.

Our extensive experience and background assisting refugees and vulnerable immigrant populations—particularly immigrants that depend on work authorization—allows us to provide valuable insight on not only the detrimental effect the proposed change will have on individuals seeking asylum, but also on the importance of work authorization in achieving self-sufficiency.

DHS proposes to remove a regulatory provision that requires USCIS to adjudicate initial Applications for Employment Authorization (Form I-765 or EAD applications) based on pending asylum applications within 30 days of filing. DHS claims that the change is intended to reduce fraud and to ensure that USCIS has enough time to process EAD applications. However, DHS fails to consider that asylum seekers already must wait 150 days after filing for asylum before they are permitted to file their EAD applications. In total, at least 180 days must pass after filing for asylum before asylum applicants can receive their EADs. Considering this lengthy wait time, the regulation requiring EAD applications to be adjudicated within 30 days of filing makes sense.

DHS further states that while USCIS dedicates many resources to adjudicating these applications within 30 days, it still faces a backlog. According to the agency, 78% of these EAD application are adjudicated within 60 days. DHS does not appear to be interested in hiring additional officers to deal with the backlog as they claim to be unable to ascertain the actual cost impact of doing so. Instead, its solution is to eliminate the 30-day adjudication requirement completely. This change is not a real

solution to USCIS's EAD adjudication backlogs that exist for all EAD categories. Eliminating an adjudication standard will not fix deficiencies or delays currently present in the adjudicatory process.

According to DHS, even with the proposed change, USCIS would still be able to continue adjudicating 78% of EAD applications within 60 days. This contention seems disingenuous considering that DHS does not propose expanding the adjudication timeframe from 30 to 60 days and refuses to adopt even a 90-day timeframe. The lack of commitment to a specific timeframe coupled with current EAD backlogs of up to 16 months for some categories does not support DHS's claim of being able to adjudicate 78% of EAD applications within 60 days. The most practical solution to the EAD asylum backlog would be to allow asylum applicants to file their asylum applications and EAD applications concurrently. This would allow USCIS enough time to conduct necessary screenings and background checks to adjudicate EADs hopefully within a reasonable timeframe.

Further, DHS acknowledges that EAD applicants and businesses will be impacted by the proposed change. Applicants will face delays in entering the U.S. labor force and loss of income. Delays in the ability to work would leave many asylum seekers, who are often traumatized and vulnerable, in precarious situations—homeless, unable to feed themselves and their children, and struggling to access health care. This directly contradicts DHS's focus of making sure that immigrants are self-sufficient. Individuals without means to survive must rely on friends, family, or local communities for support. Some who lack support networks are vulnerable to suffering abuse and exploitation. This proposed change would have devastating consequences, such as leaving many homeless, turning to overcrowded or unsafe conditions, and lacking basic needs like food and clothing.

Without work authorization, individuals cannot purchase health insurance under the Affordable Care Act or obtain a social security number, and often cannot apply for a state-issued identification card or driver's license, which further limits access to transportation, banking, and private-support services. Lack of income also hinders opportunities to find and retain competent legal counsel. Moreover, companies will lose productivity and profits from candidates they would have hired had they been eligible to work earlier. DHS also acknowledges that the change may result in a loss of taxes to employment tax programs, such as Medicare and social security since applicants and employers would not be paying into those programs.

As such, CWS strongly opposes DHS's proposal to change the processing of EAD applications filed by asylum applicants.



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0025

Comment Submitted by Marlene Bello, We the People of Venezuela Foundation

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## Submitter Information

**Name:** Marlene Bello

**Address:**

3104 N Armenia Ave

Suite 2

Tampa, FL, 33607

**Email:** wethepeopleofvenezuela@gmail.com

**Phone:** 8134108388

**Submitter's Representative:** Marlene Bello

**Organization:** We the People of Venezuela Foundation

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## General Comment

Delaying the issuance of an employment permit is inviting people to work in illegal ways.

The most reasonable would be to improve the system, and any weaknesses in all its aspects.

It would be more reasonable for the United States government to offer a full permit for a year and to cover a tariff.

This would avoid spending money and sometimes people would try harder to be jealous and value what they have cost money.

The workmanship of the immigrant must be blessed, always and when the immigrant has to adapt to the norms and laws of the country.

Norms that should definitely be revised to improve and not to impure.

I think that the work permit must have a cost for those who seek to establish themselves in this country based on the figure of an asylum application. If you understand that the system is collapsed, I must leave all these people with an authorization to build up what will cause chaos in the communities and consequently in the economy.

Invite the economic collapse without proportion.

AR001543

The most healthy are to allow a work permit with annual renewal that is decided by the asylum process of the applicant.

Many immigrants come to the United States looking for opportunities. I believe that in the United States, it is time for you to consider establishing factories, assemblers, factories and others in Latin America. Encouraging this workforce with the work that in turn will bring prosperity to these countries and will result in mutual benefit.

AR001544

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0026

Comment Submitted by Laura Belous, Florence Immigrant and Refugee Right Project

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## Submitter Information

**Name:** Laura Belous

**Address:**

738 N 5th Ave  
Tucson, AZ, 85705

**Email:** lbelous@firrp.org

**Phone:** 5202697153

**Submitter's Representative:** Laura Belous

**Organization:** Florence Immigrant and Refugee Right Project

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## General Comment

See attached file(s)

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## Attachments

FIRRP EAD 30 day comment

AR001545



September 24, 2019

*Submitted online via the Federal eRulemaking Portal*

Department of Homeland Security  
U.S. Citizenship and Immigration Services  
Office of Policy and Strategy  
Chief, Regulatory Coordination Division  
20 Massachusetts Avenue, NW  
Washington, D.C. 20529-2140

RE: Comments on Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications

Docket Numbers:

CIS No. 2617-18

DHS Docket No. USCIS-2018-0001

Dear Sir or Madam:

The Florence Immigrant & Refugee Rights Project (“Florence Project”) submits these comments to the U.S. Citizenship and Immigration Services (USCIS) on the above-referenced proposed revision: Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications

## **1. Background**

The Florence Project is a 501(c)(3) non-profit organization that provides free legal and social services to the 7,000 immigrant men, women, and children detained in immigration custody in Arizona on any given day. As the only non-profit organization in Arizona providing free legal services to people in immigration detention, our vision is to ensure that every person facing removal proceedings has access to counsel, understands their rights under the law, and is treated fairly and humanely.

The Florence Project was founded in 1989 to provide free legal services in a remote immigration detention center in Florence, Arizona where detainees had no meaningful access to counsel. We have expanded significantly since that time, and now provide free legal services to all detained men and women and unaccompanied children in Arizona.

The Florence Project represents hundreds of clients seeking asylum each year, including unaccompanied children filing I-589s before USCIS as well as adults filing I-589s before the Executive Office of Immigration Review (EOIR). These clients have often fled from horrific domestic violence, political violence, and other types of persecution.

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Web: [www.firrp.org](http://www.firrp.org)

### **FLORENCE OFFICE**

P.O. Box 654  
Florence, AZ 85132  
Tel: 520-868-0191  
Fax: 520-868-0192

### **PHOENIX OFFICE**

2025 N. 3rd Street  
Suite 205  
Phoenix AZ 85004  
Tel: 602-307-1008  
Fax: 602-340-0596

### **TUCSON OFFICE**

738 N 5th Avenue  
Suite 101  
Tucson, AZ 85705  
Tel: 520-777-5600  
Fax: 520-829-4154



## **2. The Importance of Work Permits for Asylum Applicants**

Work permits are vital lifelines that allow our clients to support themselves and their families while their asylum claims are being adjudicated. The proposed changes will result in greater unsafety, isolation, and uncertainty while clients wait for their claims to be adjudicated.

In our experience, the time it takes for an asylum application to be adjudicated is extremely unpredictable. For example, some of our unaccompanied child clients have claims adjudicated within six weeks of filing, while others wait more than three years. Likewise, while a detained adult might have her I-589 adjudicated within three or four months of filing, a client who is released from detention might wait up to five years to have his claim heard before the Phoenix immigration court. The average wait time for all asylum adjudications is two years.<sup>1</sup>

During that time while asylum claims are pending, our clients rely on their work permits to become economically self-sufficient.

For example, our client Juan (all names changed to protect privacy) traveled to the U.S. on the top of a freight train, fleeing the daily beatings and threats that he endured at the hands of his stepfather in Honduras. Just a few months after his 18th birthday, he found himself alone and without any support.

Juan applied for a work permit after his I-589 had been pending for 150 days. The EAD was issued quickly, in just less than two months. Juan's approved work permit allowed him to enroll in a job training program through a community partner where he was given vocational classes and a paid internship with a mechanic. It also allowed him to support himself and meet his basic needs without having to rely on anyone else.

Juan was able to prepare for and participate in his asylum interview without worrying about where he would sleep each night. When his asylum application was approved a few months later, he was able to move to Texas and take a job with an electrician, building on the skills he gained when he was in the training program.

Had Juan's EAD not been adjudicated quickly, it is likely that he would have become homeless while waiting for his claim to be adjudicated. Because he was able to support himself, the community resources available for the homeless were able to be more appropriately directed to people in our communities who are in greater need.

This proposed rule change seems to be at direct odds with the new public charge rule, which bars immigrants from permanent residency if they have used or are likely to use public benefits.<sup>2</sup> The swift issuance of work permits is the fastest and most effective way to reduce the number of immigrants who need financial assistance.

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<sup>1</sup> [https://trac.syr.edu/phptools/immigration/court\\_backlog/apprep\\_backlog\\_avgdays.php](https://trac.syr.edu/phptools/immigration/court_backlog/apprep_backlog_avgdays.php)

<sup>2</sup> <https://www.federalregister.gov/documents/2019/08/14/2019-17142/inadmissibility-on-public-charge-grounds>

EADs also provide important government-issued identification that allow our clients to become better integrated into our communities while waiting for their claims to be decided.

For example, Celia was sixteen when she and her mother fled Colombia after decades of violence at the hands of the FARC, an armed guerilla group that controlled the region where Celia and her family lived.

Both Celia and her mother applied for asylum. Her mother was able to use her swiftly-issued EAD to take a position as a childcare worker and begin supporting herself and Celia. Although Celia was not working, the EAD served as valuable government-issued identification that allowed her to quickly enroll at a local community college. If USCIS were to adopt the proposed rule, Celia's mother would not have been able to earn enough money to support herself and her daughter, and Celia would not have been able to further her education.

Celia's asylum application was approved and she is now a permanent resident studying art at an Arizona university. However, due to the variation in the adjudication times, her mother's application remains pending and she continues to support herself while waiting for her interview to be scheduled.

The current rule that requires EAD adjudication within thirty days means that asylum applicants can support themselves, provide valuable labor in the job market, and quickly integrate into our communities. Forcing asylum applicants to wait for their claims to be adjudicated without a work permit will push them into unsafe jobs where employers can take advantage of their precarious position. It will prevent millions in tax revenue from entering the economy, both on income earned and through the spending power of people who are able to support themselves. Most troubling of all, it will result in the further isolation and exclusion of asylum seekers from our communities.

### **3. FIRR's Opposition to the Proposed Rule**

The Florence Project is deeply concerned that, without the 30-day processing requirement, EAD applications from asylum seekers will be delayed indefinitely. Without access to work permits, people in precarious situations like Juan would not have the ability to support themselves and their families, build their lives, and contribute to our local economies. Clients like Celia will lack government-issued identification that helps them integrate into life in the U.S.

The right to seek safety and protection in the United States is unequivocal. By decreasing access to the tools that allow asylum applicants to meet their basic needs while waiting for decisions on their claims, the proposed rule is undercutting that fundamental right.

#### **4. Conclusion**

Because this proposed rule change places a serious burden the most vulnerable immigrants, we strongly oppose the proposed regulation and request that it be withdrawn. We respectfully request that USCIS continue processing asylum-based EAD applications pursuant to its current policy and practices that require adjudication within 30 days of filing.

We appreciate your consideration and thank you for the opportunity to submit these comments. Please contact us at [lblous@firrp.org](mailto:lblous@firrp.org) should you have any questions about our comments or require further information.

Laura Belous, Esq.  
Advocacy Attorney  
Florence Immigrant and Refugee Rights Project  
p. 520-269-7153  
f. 520-829-4154

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> September 27, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0027

Comment Submitted by K Siebert

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## Submitter Information

**Name:** K Siebert

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## General Comment

This is an atrocious proposal. The US government should not indefinitely leave asylum seekers in a state of confusion. The 30 day statement is added to ensure applicants at least receive some sort of response within a month of submitting their application. This is the absolute minimum requirement one would expect when submitting a formal application to a sovereign government.

Our country has always taken advantage of the less fortunate and financially unstable. It began with slaves being stolen from their homes in Africa, transitioned to abuse of Chinese laborers to build the US railroad system while we committed genocide against the Native Americans stealing their land and raping Native American women. Today we continue to oppress African Americans and, in the past 100 or so years, have focused more and more on oppressing Spanish speaking individuals, primarily from Central and South America. The US government continues to build upon a structure intended to ignore migrants and ultimately trap them in an "illegal" status most often due strictly to negligence.

The removal of the 30 day rule would add on to the embarrassing legacy intended to maintain asylum seekers who are primarily Spanish speaking individuals from Central and South America. There is no justification for removing the rule other than to make it legal to ignore valid asylum requests from individuals seeking help.

It is actions like removing the 30 day requirement on asylum applications that makes me embarrassed to say I am a citizen of this country. The day our elected officials begin representing the people who voted them in office is a day I HOPE I am able to see before I pass away.

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# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0028

Comment Submitted by Francis Joydhor

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## Submitter Information

**Name:** Francis Joydhor

**Address:**

24588 Canada Street

Loma Linda, CA, 92354

**Email:** francisjoydhor@verizon.net

**Phone:** 909-763-1482

**Fax:** None

**Submitter's Representative:** Self

**Organization:** Individual/Private party

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## General Comment

The USCIS must STOP giving an initial EAD to the Asylum Seekers while their petition is pending with the USCIS or the Immigration Courts. The Asylum Seekers can have EAD or Non-restricted Social Security Card once their petition is granted by the USCIS Office or the Immigration Courts. A non-restricted Social Security Card may given to the Approved Asylee in lieu of initial EAD Card that will save a big amount of government's money.

Current provision (150 + 30 Days) for issuing an initial EAD to the Asylum Seekers while their case is pending with the USCIS Office or Immigration Court it's like a open windows that means this provision encourages peoples to come here either illegally or inspected their visas at the port of entry and then seek Asylum; because they already know in advance that they will receive an initial EAD automatically after 180 days.

The illegal immigrants flow will dramatically decrease once the provision for issuing of initial EAD to the pending asylum seekers is completely taken off. I strongly support to eliminate the provisions for issuing an initial EAD to the Asylum Seekers while their cases are pending with the USCIS Office or Immigration Courts. Asylum seekers are entitled to receive this benefit once their case is approved either by the USCIS Officers or the Immigration Court Judges.

AR001551



# PUBLIC SUBMISSION

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<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0029

Comment Submitted by Jacqueline [Last Name Unknown]

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## Submitter Information

**Name:** Jacqueline Anonymous

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## General Comment

This rule will not only hurt the American economy but also have negative consequences for community members that are U.S. citizens that live in any region of the country which is trying to integrate asylum seekers

This proposed regulation is nothing short of a very shortsighted attempt to exclude a group of individuals who have been facing an incredible amount of mistreatment and have been subjected to any kind of harm imaginable. Asylum seekers whose cases have been pending as long as 180 days should be eligible to work in the U.S. simply because of the fact that these individuals will and do pay taxes as any other worker in the U.S. In case these individuals are deprived of their only legal way to survive and make a living for themselves without being exploited by greedy potential employers who would hire them even without work authorization and take advantage of the precarious situation these individuals have found themselves in (not to mention the fact that they will be evading all state and federal taxes pursuant to the recruitment of an individual, which they would not have been able to, had they been employing workers who have been officially granted even a provisional work authorization.)

This provisional work authorization comes with strings attached as well and is subject to review and necessary controls. If an individual's petition for asylum is denied, the individual is bound to lose their work authorization. The term limit for authorization is simply 24-months instead of longer periods that have been enacted for lawful permanent residents, which enables USCIS to monitor the compliance of asylum seeker's with rules and laws of the United States.

The administration should know that almost all asylum seekers and asylees are very grateful to the tremendous generosity and good will of the people and the government of the USA towards them and they really appreciate everything this great country has to offer, even more so than native born US citizens, who were fortunate enough to have been born in the right geographical location. Whether you like or dislike the policies of the Trump administration, if the real goal here is to make sure American people will prosper and benefit from a sane, modern immigration policy, this is not the right way to ensure that outcome. It will be the American people who will benefit from the presence of law-abiding, tax-paying human beings who not only aspire for the ideals and principles of the US but also feel indebted and deeply loyal for the American people and state. I myself for a fact

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can say that there are asylum seekers who want nothing more than living to see the day when they can truly call themselves American, who do not feel allegiance and loyalty to any other country, including the one which has rejected them, subjected them to all kinds of persecution and dehumanized them.

I happen to agree with the President when he says America first, in fact I can take it further and say America Only. Though individuals who have fled oppression who did not choose to come here to lead a better life but who made their way here through a perilous journey to simply be able to survive and live a life with dignity are not a threat to the wellbeing of this great nation. It will be wise for the administration to not let this proposed regulation come into effect simply because it will be beneath a the greatest nation on earth that is the United States of America. It will run contrary to the generosity, kindness, charitable and humane nature of the American people. I for one can state for certain that there are asylum seekers who would gladly die for this country will be those who suffer the worst of the consequences, deprived of human dignity, rendered indigent and run the risk of becoming a `public charge` if this regulation comes into effect. Decent, law-abiding people who simply want to work and make a life for themselves from nothing should be allowed to pursue that virtuous goal.

To end this entreaty, I deem it fit to remind us of this verse: "You shall not wrong a stranger or oppress him, for you were strangers in the land of Egypt."

AR001553

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0030

Comment Submitted by Delene Perley

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## Submitter Information

**Name:** Delene Perley

**Address:**

15 Middle St. Unit 302

Portland, 04101

**Email:** DelenePerley@gmail.com

**Phone:** 2078051089

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## General Comment

I have volunteered with asylum seekers. They are special people. Most have skills we need here and should be welcomed. Their stories are harrowing. Do not send them back to be abused and/or killed. Make life easier for them, instead. Where is your heart?

AR001554

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0031

Comment Submitted by Jasmine R

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## Submitter Information

**Name:** Jasmine R

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## General Comment

To Whom It May Concern,

I am writing to the DHS on behalf of this policy (DHS Docket No. USCIS-2018-0001). Like many other constituents on this thread, I am also opposed to this amendment in the policy. Not only does it take away accountability, it adds on to the stress of special members of our community. This country was once sought to be a melting pot of cultures but it is turning into a big salad. Everyone has an idea about what should be in the salad and we (Americans) are deciphering what (who) does or does not belong in the salad based on false ideologies about what a salad should be.

As it stands now, Asylum seeking applicants currently have to wait nearly 180 days to even receive their EAD, 150 of those days are just waiting to fill out the application. This process is long drawn out and continuously acts as a barrier to keep communities of color out. The current 30 days policy acts as civil duty to ensure that applicants are able to get proper documentation in a great deal of time. The applications are merely 2 pages long, 30 days should act as more than enough time to allow someone admittance to work in a country where they are already residing. Immigrants are continuing to come here whether politicians like it or not, how we as a society choose to move forward aids a lot in the culture surrounding immigration.

Whether applicants are using their EAD's for short seasonal work or long term goals to provide better for their family, why should society act as a barrier to keep applicants out. The over arching idea that Asylum applicants have bad mysterious pasts is an over-exaggerated idea to distort the perceptions of black and brown communities. These policies aren't being enacted to keep European immigrants out, rather they are being adopted to alienate hispanic communities, Caribbean communities, and many other communities of color. I stand with alienated communities of color and I also stand against this policy.

AR001555

References:

<https://www.aila.org/advo-media/agency-liaison/submit-feedback-notices-requests-for-comment/removing-30-day-processing-provisions-asylum-ead>

<https://learn.simplecitizen.com/2017/09/what-is-form-i-765/>



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0032

Comment Submitted by Lisa Rochow

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## Submitter Information

**Name:** Lisa Rochow

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## General Comment

To Whom It May Concern at U.S. Citizenship and Immigration Services (USCIS):

As a citizen of the United States of America and a resident in Michigan, I am concerned that the proposed regulations (DHS Docket No. USCIS-2018-0001) will leave asylum seekers without employment authorization indefinitely while simultaneously awaiting decisions on asylum applications in trepidation. This change will risk harming my immediate community of classmates, colleagues, and friends by fostering a delay in time an asylum applicant must wait to legally work or get a state identification while their application is pending. This change will burden isolated social networks within families and communities, as well as charities and non-profits which assist in supporting children and families who are inconvenienced by the employment authorization/asylum seeking process. The proposed regulation will make it challenging for small, local businesses (in both rural and urban communities) to find workers, and can develop negative compounding effects which, in turn, could destabilize entire communities.

In addition to the wait times asylum seekers have to endure with asylum applications, interviews, and decisions, asylum seekers are one of the most vulnerable populations in this nation with extensive medical and mental health needs due to their trauma and persecution fueled by unfounded hate and discrimination. Asylum seekers must work to provide food, clothing, shelter, and other fundamental needs for themselves and their families, just as any other individual in this country, but are also commonly rejected from public assistance programs. Without employment authorization, asylum seekers are reliant on individual support networks, private charities, and non-profit organizations.

The Universal Declaration of Human Rights protects the human right to seek and enjoy asylum from persecution. The United States has committed to that principle through the International Convention on Civil and Political Rights, the Refugee Convention and Protocol, and the Convention Against Torture. This right has been codified in federal law. Without access to a means of basic support (employment) during the asylum process, the United States fails its commitment to this fundamental human right.

AR001557

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0033

Comment Submitted by Suzanne Sorkin

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## Submitter Information

**Name:** Suzanne Sorkin

**Address:**

800 Cottageview Dr. Ste. 411

Traverse City, 49684

**Email:** sorkin@msu.edu

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## General Comment

DHS should make work permit decisions quickly so that someone seeking asylum doesn't need to rely on other people's charity to survive while the government processes their paperwork. Please do not remove the 30 day processing process.

AR001558

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0034

Comment Submitted by Jina Krause- Vilmar, Upwardly Global

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## Submitter Information

**Name:** Jina Krause-Vilmar

**Address:**

505 8th Ave

Suite 1100

New York City, NY, 10018

**Email:** jina@upwardlyglobal.org

**Phone:** 212.219.8828 Ext. 202

**Submitter's Representative:** Sara McElmurry

**Organization:** Upwardly Global

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## General Comment

See attached file(s)

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## Attachments

Upwardly Global

AR001559



October 10, 2019

*Submitted via Federal eRulemaking Portal: <http://www.regulations.gov>.*

OMB USCIS Desk Officer

**Re: DHS Docket No. USCIS-2018-0001 - Public Comment Filed Opposing Proposed Rule “Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications,” filed on 09/09/2019; FR Doc. Number 2019-19125; Doc. Citation 84 FR 47148, Pages 47148-47170.**

Dear Desk Officer:

I am writing on behalf of Upwardly Global in opposition to the Department of Homeland Security’s (DHS) proposed rule, “Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications,” DHS Docket No. USCIS-2018-0001 (the “NPRM”), published in the Federal Register on September 9, 2019. We are filing these comments before the deadline of November 8, 2019.

Upwardly Global is a national nonprofit organization committed to building an inclusive, future-ready workforce that embraces the skills of immigrant, refugee, asylum seeker and asylee professionals. Since our founding in 2000, we have supported more than 15,000 work-authorized, college-educated newcomers—including asylum seekers—with job coaching, networking and skill-building programs, ensuring that they can fully contribute their education, skills and experience to the U.S. workforce. Our extensive experience and background assisting asylum seekers and asylees who have secured work authorization positions us to understand, at the most fundamental levels, the importance of their ability to secure work authorization as quickly as possible to facilitate their ability to integrate into the U.S. and achieve self-sufficiency.

Upwardly Global is deeply concerned about the plan outlined in DHS’s [NPRM](#) to remove a 30-day processing regulatory provision for employment authorization document (EAD) applications for asylum seekers. **While the stated benefit of the NPRM is to improve DHS’s ability to process a growing backlog of applications**

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**for asylum protections,<sup>1</sup> Upwardly Global data illustrate that addressing the backlog by denying self-sufficiency to asylum seekers comes at significant humanitarian and economic cost.**

Upwardly Global knows first-hand that asylum seekers have considerable skills to offer the U.S. workforce. Since 2017 alone, our organization has been proud to assist more than 300 asylum seekers nationwide in rebuilding their careers in high-demand fields, including IT, engineering, and healthcare, filling critical skills gaps in the U.S. workforce while they seek humanitarian protections in the U.S. Together, Upwardly Global's cohort of asylum seekers earns more than \$17 million annually—an average salary of nearly \$55,000 each—contributing an estimated \$1.5 million in federal taxes annually and bolstering local economies with consumer spending.

Recent success stories illustrate the potential and promise that asylum seekers bring to our economy, including:

- A scientist from Eritrea. With work authorization and support from Upwardly Global, he is now working in the bioinformation sector in Maryland, earning \$50,000 annually.
- An educator from Syria. After receiving her EAD, she secured a position as a chemistry teacher at a school in Tennessee and now earns \$40,000 annually.
- A physician from Iraq. With an EAD and assistance from Upwardly Global, he is an internal medicine resident in a New York-area hospital, earning more than \$70,000 annually.
- A finance professional from El Salvador. After receiving his EAD, he enrolled in Upwardly Global's program and now works as a staff accountant for a nonprofit in the Bay Area, earning \$60,000 annually.
- A sales professional from Syria. After receiving her EAD, she is now contributing her talents to the pharmaceutical industry in California with a \$165,000 salary.

In its NPRM, DHS acknowledges that delays to EAD processing would stymie economic contributions from future cohorts of asylum seekers, resulting in lost wages, impacts on tax revenues, and costs to employers. Upwardly Global believes that DHS underestimates the scope of asylum seekers' contributions to our workforce and that the

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<sup>1</sup> Upwardly Global is concerned that USCIS has resources available to address the backlog, but they are not being used as such. For example, reports have surfaced that [USCIS leadership has asked staff to volunteer time to support other areas of DHS operations](#), including the administration of the "Remain in Mexico" program in ICE field offices. Such requests, which unnecessarily divert agency resources from its core work of processing asylum and EAD applications, should be discontinued before the agency considers the changes outlined in the NPRM.



economic and humanitarian costs of the NPRM are likely higher than estimated. Our specific concerns include the following:

1. **DHS underestimates asylum seekers' economic contributions in estimating the NPRM's effects on wages and taxes.** By DHS's own data estimates, the proposed rule change could result in [\\$255.88 million to \\$774.76 million](#) in lost compensation for asylum seekers annually, linked to tax losses from [\\$39.15 million to \\$118.54 million](#) each year. Estimates in the NPRM were based on a robust "prevailing" minimum wage of [\\$8.25](#) to calculate the lower bound and a national average wage of [\\$24.98](#) to calculate the upper bound. The NPRM was also based on the notion that EAD holders "[would not have been in the labor force long, and would thus not be expected to earn relatively high wages.](#)"

However, Upwardly Global data challenge these notions. All of our program participants arrive in the U.S. with college degrees or technical certification from their home countries; half bring experience in STEM, healthcare, or finance fields. The above-average salaries they command after securing EAD illustrate the premium that U.S. employers place on their skills and experience. The asylum seekers who have completed Upwardly Global's program earn an average of \$54,875 annually, significantly higher than the national annual mean wage of [\\$51,960](#). Several program alumni earned six-figure salaries. DHS estimates of the NPRM's wage and tax impacts are likely low.

Furthermore, DHS claims that implementing the NRPM will result in overall cost savings to the agency in the form of fewer personnel needed to process EAD applications. These personnel savings ostensibly justify the proposed rule's negative effects on wages and tax revenues. However, [DHS has not estimated personnel costs](#). The economic estimates and justification of the NPRM warrant deeper analysis.

2. **The burden on U.S. employers will be more significant than described in the NPRM.** In addition to lost wages and tax revenues, the NPRM acknowledges that changes to EAD processing would result in additional costs to companies who hire asylum seekers, in the form of recruitment costs and lost profits. In addressing these costs, the rule assumes that employers will be able to find a "[reasonable substitute](#)" for the labor that asylum seekers would have provided.

However, Upwardly Global's experience in working with 50 employers across the country suggests that asylum seekers often occupy hard-to-fill jobs in the U.S.

workforce. Half of our program participants—including asylum seekers—come to the U.S. with backgrounds in the STEM and healthcare fields, industries with well-documented [worker shortages](#) in the U.S.

3. **The rule will have unintended consequences for our communities.** The proposed rule change comes with significant humanitarian costs. Under the current system, asylum seekers must wait 150 days before applying for EAD. The existing five-month wait period for asylum seekers to work puts them in [vulnerable situations](#), including homelessness, hunger, and limited access to healthcare. The proposed rule would eliminate the current requirement that USCIS process EAD applications within 30 days, meaning that asylum seekers could wait more than six months before being able to apply for jobs. Even now, with guidelines in place, the agency fails to meet the 30-day mandate in [more than half of cases](#).

**In light of the above concerns, we urge DHS to withdraw this proposed rule and instead allow the 30-day EAD processing timeframe to remain in place, or alternatively, to allow asylum seekers to apply for an EAD concurrently with their asylum application.** Upwardly Global calls for the government to build policies that support orderly access to humanitarian protection and equip asylum seekers with the ability to support themselves while their cases are pending. We urge USCIS to champion policies that recognize asylum seekers' contributions to our economy and build pathways for their full integration into our workforce.

Sincerely,

Jina Krause-Vilmar  
President & CEO  
Upwardly Global

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> October 10, 2019
<b>Status:</b> Posted
<b>Posted:</b> October 10, 2019
<b>Tracking No.</b> 1k3-9cni-tqm2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0035

Comment Submitted by Marilyn Rivas- Martinez

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## Submitter Information

**Name:** Marilyn Rivas-Martinez

**Address:** United States,

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## General Comment

As the daughter of Central American immigrants, who were granted protected status and subsequently became residents, I oppose the removal of 30-day processing for employment authorization for asylum seekers. The DHS proposed a regulation that would seek to eliminate the 30-day processing time frame for USCIS to accept or deny an EAD application of an asylum seeker. According to DHS, the elimination of the time frame will ensure USCIS has enough time to receive, screen, and process applications, therefore, solving the problem of fraud. DHS believes the proposed regulation would allow USCIS to have sufficient time to account for the volume of applications while adjusting to current processes that protect against fraud and national security threats. The issue with this proposed regulation is that it does not take into account the consequences of the removal of the 30-day processing period. It will negatively affect the U.S. economy and asylum seekers. The solution I propose to the problem outlined by DHS is first, to focus on acquiring more resources for the service center operations rather than using all resources at the southern border. Second, DHS should propose a new regulation with a new interval that exceeds 30-days, since 30-days is believed to be outdated, therefore still requiring DHS to accept or deny an application in a timely matter.

Asylum seekers that apply for employment authorization are awaiting for their refugee status application to be processed. They are seeking the ability to work and provide for the survival of their family legally while contributing to the U.S. economy. Removal of the 30-day framework without the placement of another time frame, would not guarantee the applicant a response in a reasonable period nor a response at all, despite the applicants need to work. According to Dan Kosten, an assistant director at the National Immigration Forum, it would force the applicants to work under the table, instead of with authorization as intended with applying. An asylum seeker is escaping to the U.S., thus these individuals are not coming with an excessive amount of money or resources for survival. Therefore, to survive, they must work to provide for their families. For example, my mother and father came with the clothes on their backs from Central America, how would they have supported themselves if they could not work? There is a limited amount an asylum applicant can obtain without employment. Consequently, applicants who work illegally would negatively affect the economy by violating tax, insurance, and employment laws. If an asylum seeker were to work illegally, there is a probability the individual

AR001564

would not pay the corresponding taxes to the income earned. Removal of the 30-day time frame would also permit a shadow economy that would be difficult to regulate.

The proposed regulation would be another restriction on immigrants and their lives in the U.S. Asylum seekers are required to wait 150 days after filing for an asylum application to apply for an EAD. Thus, on day 180, the current rule requires the USCIS to inform applicants if they have been accepted or denied a permit for employment. Asylum seekers are already undergoing excessive stress due to fleeing their country, and the anticipation of waiting for the decision of their refugee status. The elimination of the 30-day processing and the inability to work would increase the mental pressure these individuals are experiencing. Jessica Gorelick, a social worker, witnessed a refugee in the days he awaited for his employment authorization. During this time, the asylum seeker slept on the streets. When granted a permit to work, he was able to get an apartment and became a member of society. The 30-day time frame allows refugees to know whether their application has been accepted or denied promptly and protects them from sleeping on the streets.

Lastly, I will address the DHS's concern about potential fraud and national security. EADs are sent to a card production facility and are produced to be tamper-resistant to prevent fraud. According to the DHS, the current process to produce an EAD is not consistent with the 30-day time frame. To continue meeting with the 30-day time frame, the DHS could acquire more resources for the service center operations and card production facilities, such as by hiring more staff or increasing funds to produce cards faster. The agency has also changed vetting procedures and increased background checks. Therefore, the agency claims they need to have more than 30 days to ensure the nations security. The DHS national security concern could be resolved with an extension of the 30-day time frame. Perhaps, a 45-day time frame, to protect refugees and ensure their ability to work to make ends meet. The proposed regulation must be revised and establish a clear time frame for asylum seekers to expect an acceptance or denial for their EAD while having enough time for USCIS to process applications.

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<b>Tracking No.</b> 1k3-9cny-dnh1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0036

Comment Submitted by Jeff Christensen

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## Submitter Information

**Name:** Jeff Christensen

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## General Comment

Extension of a 30-day processing provision to ensure that USCIS has additional time to devote to each application (to ensure that their review is of adequate quality and that fraud detection, e.g., actually functions) might be a good idea; it has, at least, legitimate positive qualities. USCIS is clearly overworked, and if we accept the premise that their being overworked is harming our country (as DHS believes), then this extension makes sense. However, this is not an extension: it is simply a revocation. Without replacing the 30-day time period with another time period, there will be less motivation for USCIS to respond quickly. As it stands, this rule says that 78% of applications are turned around within 60 days will this continue to occur if USCIS is not mandated to return them within that time period? Removing the incentive for USCIS to work quickly will result only in their obligations being stripped; it will not cause them to work more effectively. This may also increase the immense delays that are already present at the border. When we are struggling to deal with the number of applicants, we should not remedy this by removing USCIS's obligation to work by a deadline.

Amending a rule to limit the burden on USCIS to ensure the betterment of our country might be a good idea. Doing so by removing their required deadline, without replacing it, is not.

AR001566

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0037

Comment Submitted by Lindsey Greising, The Advocates for Human Rights

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## Submitter Information

**Name:** Lindsey Greising

**Address:**

330 Second Ave South

Suite 800

Minneapolis, Minnesota, 55401

**Email:** lindseygreising@gmail.com

**Phone:** 6127464691

**Fax:** Minnesota

**Organization:** The Advocates for Human Rights

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## General Comment

I am concerned that this change will harm clients, businesses, and communities by further delaying the time an asylum applicant must wait to legally work or get a drivers license while their application is pending. This change will burden private support systems and charities, make it difficult for small businesses to find workers, and could have multiplier effects in terms of destabilizing communities-- causing violence and increased crime. I am also concerned that this change represents yet another attempt to impede the right to seek asylum.

Of particular concern is the proposed elimination of the 30-day rule without providing a maximum processing time. Already, the six-month waiting period places a heavy burden on asylum seekers who were forced to flee, often having to leave behind or spend in transit any resources they may have had.

Asylum seekers today face long backlogs in asylum processing, often waiting years after filing the asylum application for an interview and, even later, a decision. Asylum seekers are often vulnerable, with medical and mental health needs due to their trauma and persecution. Generally excluded from public assistance, asylum seekers must work to provide food, clothing, shelter, and other basic needs for themselves and their families. Asylum seekers who were forced to leave spouses and children behind must save thousands of dollars to pay for travel expenses. Without employment authorization, asylum seekers are dependent on individual and other private charity.

AR001567



Indefinitely blocking asylum seekers ability to support themselves and their families is an abuse of discretion and an attempt to further deter people from seeking asylum in the United States. The proposed rule comes on top of extreme adjudication delays by USCIS across all types of cases and recent changes in USCIS customer service procedures which make it nearly impossible to follow up on pending cases.

The proposal attempts to justify the proposed rule on the basis of national security and vetting concerns and on administrative efficiency interests. In terms of administrative efficiency, the proposed rule notes the burden that has resulted from shifting staff to timely process EAD applications in compliance with *Rosario v. USCIS* and claims there will be a cost saving by eliminating the timeline. However, it notes USCIS could hire more officers, but has not estimated the costs of this and therefore has not estimated the hiring costs that might be avoided if this proposed rule were adopted. Without undertaking the adequate analysis and research to justify this rule, the proposal is unjustified and arbitrary.

The proposal also cites vague security concerns which the federal court in *Rosario* found to be sufficiently low that it ordered USCIS to comply with the 30-day processing deadline. Any need for additional vetting prior to issuance of employment authorization could be addressed by less draconian means than simply eliminating the processing parameters for all applicants.

For years, our communities have been made stronger by welcoming asylum seekers. Allowing for employment authorization for such individuals is a crucial means of lowering the burden on private support systems while ensuring basic needs are met for these vulnerable individuals already in our society. Allowing work authorization also allows for a pool of crucial workforce to help fill the gaps in demand for laborers. Removing the processing time may be expedient for USCIS, but it will cause more harm to industry, communities and individuals-- and DHS has not undertaken sufficient research and analysis to justify the change. Until cost-benefit analysis of additional hiring is done, and more detailed security protections are explained, this rule change should be viewed as arbitrary and capricious.

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0038

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

DHS should decide quickly (within 30 days) whether someone seeking asylum can have a work permit. By dragging out the process these people have to rely on other peoples' charity for extensive periods of time while our government drags out the paperwork. Please keep the 30-day decision requirement for work permits.

AR001569

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0039

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The 30 day period affording asylum applicants a timely decision on employment application is vital for asylum workers to support themselves while they await a decision on their status. Asylum seekers are already an incredibly vulnerable population, and effectively stripping them of their ability to work and support themselves in what can tend to be an incredibly lengthy process. These asylum claims can take up to five years to be decided; the average wait time is two years. Work permits are important for the safety of asylum seekers, and a greater waiting time before these individuals know if they are able to work to support themselves and their families simply increases uncertainty and leads to greater inefficiencies in this system.

AR001570

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<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0040

Comment Submitted by Megan Raymond

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## Submitter Information

**Name:** Megan Raymond

**Address:**

Berkeley, CA,

**Email:** meganraymond@berkeley.edu

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## General Comment

The 30-day rule, ensuring that asylum applicants get a decision on whether they will receive employment authorization within 30 days is vital to asylum workers and our economy. But furthermore, rescinding this rule raises serious Due Process constitutional concerns. The Fifth Amendment states that no person shall . . . be deprived of life, liberty, or property, without due process of law. Courts have consistently held that anyone on U.S. soil is due Due Process. By depriving asylum applicants the opportunity to receive timely 30-day notice of whether or not they have received employment authorization, this proposed rescinding of the rule violates applicants Fifth Amendment rights. It is a form of depriving asylum applicants of their property (the money they have gained through employment, which would help them avoid deportation).

AR001571

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0041

Comment Submitted by Reed Shaw

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## Submitter Information

**Name:** Reed Shaw

**Address:**

2128 McKinley Avenue

Berkeley, CA, 94703

**Email:** reedgshaw@gmail.com

**Phone:** 4349069669

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## General Comment

I think this rule change is a violation of the Universal Declaration of Human Rights Article 14, Section 1, which guarantees that "everyone has the right to seek and to enjoy in other countries asylum from persecution."

Because of the Trump Administration's rule against approval for asylum seekers who could become a "public charge" by using our social safety net, this new rule change could cause more asylum denials. The resulting increase in denials would further erode the United States' adherence to the UDHR, as asylum applicants of lesser means would be returned to countries in which they face persecution.

AR001572

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0042

Comment Submitted by Salwa Majeed

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## Submitter Information

**Name:** Salwa Majeed

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## General Comment

I, as a child of asylum seekers who were granted safety and work authorization in 2000, and as working U.S. citizen since 2013, can attest that work permits are vital lifelines in allowing individuals to support themselves and their families while their applications are being reviewed. It took my parents nearly 6 years to be granted asylum to the country, and nearly double that time to work through the citizenship process while living and working as legal residents in the country. The average wait time for asylum adjudications, as of this year, is just over 570 days nearly 2 years (see Transactional Records Access Clearinghouse, Syracuse University; EOIR; New York Times.)

On another note, there is a different proposed rule available to view on the Federal Register regarding immigrants at risk of being barred from obtaining permanent residency if they have used in the past (or are likely to use in the future) public benefits. See: <https://www.federalregister.gov/documents/2019/08/14/2019-17142/inadmissibility-on-public-charge-grounds>

Restrictions binding immigrants from obtaining legal citizenship, residency, and employment authorization are in direct conflict with public values regarding ethics and transparency. EADs serve as important government-issued identification that allow people to engage in American spaces while waiting for their asylum claims to be decided. Preventing people from having that, and being unclear as to what these provisions may do to pending applicants leaves many even more confused and frustrated in what is already an arguably challenging legalization process.

AR001573



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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0043

Comment Submitted by Alyson Ball

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## Submitter Information

**Name:** Alyson Ball

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## General Comment

It is imperative that we allow asylum seekers to work while they wait for their asylum hearing.

I do not think we should relax the requirement to process work applications with 30 days.

This just seems to be another tactic to reduce support for US asylum seekers.

Thank you,

A concerned citizen from Charlottesville, Virginia

AR001574

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> October 19, 2019 <b>Status:</b> Posted <b>Posted:</b> October 21, 2019 <b>Tracking No.</b> 1k3-9ctt-10ca <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0044

Comment Submitted by Steven Posner

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## Submitter Information

**Name:** Steven Posner

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## General Comment

I believe, based on the history of this administration, that this regulation's purpose is merely to make it more difficult for people with sufficient asylum claims to make a living in the United States, thereby discouraging asylum applications. This is inhumane and unnecessary to the economy or national security. Therefore, I protest this proposed rule.

AR001575

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0045

Comment Submitted by Lynda Wilson, Alabama Interfaith Refugee Partnership, Inc.

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## Submitter Information

**Name:** Lynda Wilson

**Address:**

2641 Paden Place  
Birmingham, AL, 35226

**Email:** lyndalawwilson@gmail.com

**Phone:** 2053061556

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## General Comment

I am the President of the Alabama Interfaith Refugee Partnership, Inc., a group that has been organized to provide support for refugees and asylum-seekers locally and globally. We are a small organization and use our scarce resources to provide initial temporary support to asylum-seekers who are in the country legally and who are in the process of seeking asylum and applying for work authorization. Delaying the time required to process the Employment Authorization Applications will put a severe burden on asylum seekers and on organizations like ours which have limited resources. People we work with are doing everything they can in order to survive and also to comply with all legal requirements for their asylum application. This rule will push more people to work illegally, and will decrease tax revenues that would be gained by allowing asylum-seekers to work legally while their asylum applications are being processed.

DHS has proposed no alternative timeline - although it considered proposing a 90-day timeframe to replace the 30-day timeframe for adjudicating EADs (see p. 47166-47167 of the Notice), which would already be three times the current timeframe, DHS proposes to instead remove a timeframe entirely, suggesting that the agency anticipates these applications being significantly delayed.

DHS already has the ability to stop the clock on the 30-day processing timeframe if they need to request additional documentation from an applicant.

DHS reports that it is now deciding over 99% of EADs within the 30-day processing timeline, demonstrating that DHS is generally able to address fraud and security concerns within the current timeframe and process.

The Rule would cause significant financial hardship to asylum applicants who are unable to work and to those

AR001576

who depend on them financially - destabilizing the financial (and therefore health, housing, etc.) situation of persons already traumatized by the threats and persecution that led them to apply for asylum.

Without an EAD and associated access to employment, asylum-seekers will have difficulty obtaining drivers licenses, banking services, healthcare, and legal counsel for their asylum applications.

The Rule would burden and stretch the capacity of charities and non-profit service providers: if asylum-seekers are unable to obtain an EAD in a timely manner, they are forced to rely on other forms of support, including organizations that provide financial, housing, legal, or other forms of assistance.

Companies that would employ these asylum-seekers will either have insufficient access to labor or bear the costs of finding alternative labor.

Local, state, and federal governments will lose income tax revenue from asylum-seekers who are delayed in entering the job market or forced to work in the shadow economy. DHS estimates that the annual Medicare and social security revenue loss to the government to be between \$39.15 to \$118.54 million dollars. DHS estimates the rule will cause asylum-seekers to annually lose \$255.88 to \$774.76 million in income.

DHS voiced concern about fraud and national security should favor prompt decisions on EADs. If DHS has a concern about an individual, then it should quickly vet the application, rather than delay.

AR001577

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0046

Comment Submitted by Catherine Cooke

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## Submitter Information

**Name:** Catherine Cooke

**Address:**

500 South Union Street  
burlington, 05401

**Email:** catherinecooke@burlingtontelecom.net

**Phone:** 8028644129

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## General Comment

I cannot understand why there is consideration of removing the 30 day processing rule for asylum seekers. I have heard that there are not individuals to process asylum seekers, but instead of making the asylum seekers wait for what I imagine might be a considerable length of time, why don't you hire more individuals to do the processing. If asylum seekers get processed in a timely manner, they can seek employment and perhaps even support themselves and maintain their dignity. Thank you, Catherine

AR001578

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0047

Comment Submitted by Elizabeth Keyes, The Immigrant Rights Clinic of the University of Baltimore School of Law

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## Submitter Information

**Name:** Elizabeth Keyes

**Address:**

1420 N Charles Street  
Baltimore, MD, 20912

**Email:** ekeyes@ubalt.edu

**Phone:** 4108375666

**Organization:** The Immigrant Rights Clinic of the University of Baltimore School of Law

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## General Comment

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue NW  
Mailstop #2140  
Washington, D.C. 20529-2140

DHS Docket No. USCIS-2018-0001  
84 F.R. 47148

To Whom It May Concern:

The Immigrant Rights Clinic of the University of Baltimore School of Law respectfully submits this comment to the Department of Homeland Security's Notice of Proposed Rulemaking on Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

AR001579



## Interest in the Proposed Rule:

Our clinic works with many asylum-seekers, in both the affirmative and court-based asylum processes. For a host of reasons, from intense backlogs at our local asylum office to the unpredictable and increasingly far-out scheduling of immigration court dockets, our clients typically wait years before having a decision on their case. Being able to rely upon EADs in the interim is vital to ensuring that during that waiting period, they can be productive and self-reliant members of society.

One of our clients with medical training used her (c)(a) EAD to work at Johns Hopkins University. Another supported herself working while attending pharmacy school. A younger client was able to rely on his EAD to secure work at college to help finance his studies. Another worked childcare jobs until she could afford a small van; in her free time, she uses the van to bring community members to their immigration appointments. And many clients are working at an assortment of jobs simply to support their families. We have seen time and again that having an EAD reasonably quickly, and reliably, has made a world of difference to each client and their families.

## Comments:

**EADs IMPROVE THE EFFECTIVENESS OF THE IMMIGRATION SYSTEM.** Anything that slows down the EAD processing for asylum-seekers works against the effectiveness of the immigration system itself. The EADs enable our clients to successfully participate in their legal cases--to make interview dates because they can afford transportation, to work on their cases because they are able to pay see doctors who help them stay healthy or regain their health. Without the ability to work, the anxiety our clients experience is crippling and detrimental to their legal cases.

**DELAYED EADs CREATE A COSTLY RIPPLE EFFECT:** Without an EAD and associated access to employment, asylum-seekers will have difficulty obtaining drivers licenses, banking services, healthcare, and legal counsel for their asylum applications. The Rule would cause significant financial hardship to asylum applicants who are unable to work and to those who depend on them financially - destabilizing the financial situation of persons already traumatized by the threats and persecution that led them to apply for asylum.

**FRAUD CONCERNS SHOULD NOT CAUSE DELAYS:** DHS voiced concern about fraud and national security should favor prompt decisions on EADs. However, if DHS has a concern about an individual, then it should quickly vet the application, rather than delay. DHS reports that it is now deciding over 99% of EADs within the 30-day processing timeline, demonstrating that DHS is generally able to address fraud and security concerns within the current timeframe and process.

**THE RULE CAUSES BURDENS TO EMPLOYERS AND CHARITIES ALIKE:** Companies that would employ these asylum-seekers will either have insufficient access to labor or bear the costs of finding alternative labor. The Rule would burden and stretch the capacity of charities and non-profit service providers: if asylum-seekers are unable to obtain an EAD in a timely manner, they are forced to rely on other forms of support, including organizations that provide financial, housing, legal, or other forms of assistance.

**DELAYED EADs DELAY REVENUE TO LOCAL, STATE, and FEDERAL GOVERNMENT:** Local, state, and federal governments will lose income tax revenue from asylum-seekers who are delayed in entering the job market or forced to work in the shadow economy. DHS estimates that the annual Medicare and social security revenue loss to the government to be between \$39.15 to \$118.54 million dollars. DHS estimates the rule will cause asylum-seekers to annually lose \$255.88 to \$774.76 million in income.

AR001580

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> October 21, 2019
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<b>Posted:</b> October 21, 2019
<b>Tracking No.</b> 1k3-9cv2-p52c
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0048

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I represent Jane Doe, an asylum seeker from Mexico and the mother of two children, one of whom has cerebral palsy. When Jane Doe first came to the United States, she was unable to provide for her children because she didn't have a work permit. She had to depend on the charity of community members, and her children often went without the resources they needed. It was only after receiving her work permit that she was able to financially provide for her children and become self-sufficient. She states: "Having a work permit gives me so much relief, like I can take a deep breath and be ok." Delaying employment authorization for asylum seekers like Jane Doe causes significant financial hardship to families, destabilizing their basic health, nutrition, and housing. It also causes harm to their mental wellbeing, causing them additional and unnecessary stress. Do not remove the current requirement that the government adjudicate asylum-seekers' applications for work authorization within 30 days.

AR001581

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> October 22, 2019
<b>Tracking No.</b> 1k3-9cv4-todf
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0049

Comment Submitted by Brian Huttenburg

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## Submitter Information

**Name:** Brian Huttenburg

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## General Comment

I believe this proposed rule to be an absurd idea. I work with youth asylum seekers, and quick processing of EADs often means the difference between being able to afford housing or living on the street. I think this rule is also absurd for the below reasons:

DHS has proposed no alternative timeline - although it considered proposing a 90-day timeframe to replace the 30-day timeframe for adjudicating EADs (see p. 47166-47167 of the Notice), which would already be three times the current timeframe, DHS proposes to instead remove a timeframe entirely, suggesting that the agency anticipates these applications being significantly delayed.

DHS reports that it is now deciding over 99% of EADs within the 30-day processing timeline, demonstrating that DHS is generally able to address fraud and security concerns within the current timeframe and process.

The Rule would cause significant financial hardship to asylum applicants who are unable to work and to those who depend on them financially - destabilizing the financial (and therefore health, housing, etc.) situation of persons already traumatized by the threats and persecution that led them to apply for asylum.

Without an EAD and associated access to employment, asylum-seekers will have difficulty obtaining drivers licenses, banking services, healthcare, and legal counsel for their asylum applications.

Without an ability to lawfully work, asylum seekers cannot afford legal counsel and are thus significantly less likely to win relief. Nationwide, fewer than 3% of families without lawyers are successful in securing asylum, with thousands receiving deportation orders despite having strong claims.

The Rule would burden and stretch the capacity of charities and non-profit service providers: if asylum-seekers are unable to obtain an EAD in a timely manner, they are forced to rely on other forms of support, including organizations that provide financial, housing, legal, or other forms of assistance.

AR001582

Companies that would employ these asylum-seekers will either have insufficient access to labor or bear the costs of finding alternative labor.

Local, state, and federal governments will lose income tax revenue from asylum-seekers who are delayed in entering the job market or forced to work in the shadow economy. DHS estimates that the annual Medicare and social security revenue loss to the government to be between \$39.15 to \$118.54 million dollars. DHS estimates the rule will cause asylum-seekers to annually lose \$255.88 to \$774.76 million in income.

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0050

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I respectfully request that the 30-Day Processing Provision for asylum applicants' I-765 form be left with a maximum of a 30-Day filing window.

Extending the filing deadline beyond 30 days is inhumane. This will only lengthen the time period in which asylum seekers have no legal way to meet their own basic survival needs. The reality is that asylum seekers are already left dependent on the charity of everyday citizens and non-profits for several months as a result of the 30-day rule.

Allowing asylum seekers to work as soon as their claim is lodged is in the best interest of all parties. For asylum seekers this removes the risk of falling prey to exploitative people or entities who offer food or housing in exchange for illegal or dehumanizing activities. It also allows asylum seekers to be contributors to our communities through productive work, paying taxes, and bringing their own unique skills and dreams to benefit all in the United States.

AR001584

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9cwg-130r
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0051

Comment Submitted by Nikki Kenny

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## Submitter Information

**Name:** Nikki Kenny

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## General Comment

I believe this change will harm businesses, communities and nonprofit organizations that provide support by further delaying the time an asylum applicant must wait to legally work or get a drivers license while their application is pending. Most asylum seekers often wait indefinitely sometime running into years for an interview after filling an application and even later, a decision. Depriving these individual work authorizations pending the outcome of their application will further burden charities and support system. It will also lead to undue exploitation of asylum seekers by some employers who will offer them a job without authorization.

AR001585



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> October 25, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0052

Comment Submitted by Manda T.

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## Submitter Information

**Name:** Manda T.

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## General Comment

I believe implementing this proposed rule of eliminating the 30-day processing provision for asylum seekers would have many negative impacts on those seeking asylum and their communities. Without a means to earn income, asylum applicants are left to rely on their family members, community, and other resources available to them. Many asylum applicants do not have such resources available to them. If they have come to the U.S. seeking asylum, they likely do not have many family members here who would be able to support them. If the process is as backlogged as stated in the proposed rule, then the number of people requesting resources from organizations created to support asylum applicants would increase dramatically if the 30-day time frame was eliminated.

This would hinder those organizations' ability to provide resources as well. Because of this potential inability of obtaining resources, asylum applicants would be left impoverished while waiting for their applications to be approved. Further, the rule does not specify an alternative time frame, meaning that the applicants could be left waiting indefinitely.

AR001586

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> October 28, 2019
<b>Tracking No.</b> 1k3-9cxy-djuc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0053

Comment Submitted by Adedayo Aribisala

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## Submitter Information

**Name:** Adedayo Aribisala

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## General Comment

The 30 days ultimatum serves as a benchmark for caseworkers, which encourages efficiency and productivity, taking these away means caseworkers no longer have to work towards a 30-day response deadline. This will lead to backlogs and increased WIP.

The 30 days ultimatum also provides applicants with an estimated waiting time to hear back from USCIS, which in turn reduces phone, mail, and email inquiry about a pending case.

The 90 days condition removal proposal would confuse applicants and reduce the time available to send EADs in for renewals or extensions.

The 90 days condition also means caseworkers would have less time to investigate every case before making a decision.

AR001587

# PUBLIC SUBMISSION

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<b>Posted:</b> October 28, 2019
<b>Tracking No.</b> 1k3-9cyh-k57u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0054

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The delay is necessary and one of many reasons Americans chose President Trump. Most asylum seekers cases turn out to be fraudulent thus those who are here for the right reasons will follow the laws and be more then willing to wait their appropriate length of time to show their desire to assimilate and actually follow American laws. I know legitimate asylum seekers who are now entrepreneurs and did everything by the book, many cuban American who support in full the hard line approach that weeds out abusive persons who use false claims of asylum for economic reasons stealing jobs from Americans, legal citizens, and approved asylum seekers. All measures, including the waiting period should be enforced and all measures to stop encouraging abuse of our system and fleecing of our tax money should be employed.

AR001588

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> October 28, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0055

Comment Submitted by Kate Fahey

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## Submitter Information

**Name:** Kate Fahey

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## General Comment

Already, asylum seekers must wait 180 days before they are eligible to get a work permit. The proposed rule would result in asylum seekers waiting months longer.

By further delaying when asylum seekers who are ready, able and eager to work can do so, the proposed rule will deprive them of the dignity of supporting themselves, and deprive the U.S., which has a million more job openings than available job seekers, of valuable workers.

A work permit is essential for asylum seekers integration and full participation in their U.S. communities. It is often their only photo identification, and is often needed to enroll in job skills programs, college, and is required to get a Social Security number, a drivers license, and a bank account.

The proposed rule will harm the U.S. economy. The preamble to the proposed rule acknowledges that it would:

put additional demands on asylum seekers support systems, including charities or community members;

cause asylum seekers lost earnings each year ranging from nearly \$256 million to \$775 million;

result in corresponding millions in lost federal payroll taxes annually;

cause lost productivity and profits to businesses that cannot tap into this labor pool for a longer period than under the current regulation.

AR001589

The proposed rule is contrary to the Administrations stated efforts (for example, with its recent revised public charge rule) to ensure that immigrants will be self-sufficient without the need for public benefits, by preventing asylum seekers from working and supporting themselves for a longer period than the already lengthy statutorily required 180 days.

The proposed rule should be withdrawn, or if not withdrawn, should be entirely rewritten, substituting a proposal to allow asylum seekers to file their initial work permit applications with their asylum applications. This will give USCIS 180 days to process initial work permit applications and achieve the stated goal of the proposed rule - to give USCIS more time to make decisions.

AR001590

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> October 30, 2019
<b>Tracking No.</b> 1k3-9d0d-bl4a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0056

Comment Submitted by Ginger Lechner

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## Submitter Information

**Name:** Ginger Lechner

**Address:**

4616 Merendino St  
Raleigh, NC, 27606

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## General Comment

If the proposed change to remove the 30-day processing provision for employment authorizations for asylum applicants becomes final, it will mean long delays in obtaining work authorization for asylum applicants. Asylees without work visas cannot be expected to survive in the United States. They have fled for their lives, would not be eligible for public benefits for many years, and would be forced to engage in unauthorized work in order to eat and provide shelter for themselves. This proposed rule change goes against one of the US's foundational values - to ensure that every person is a contributing member of society, so that all of us can thrive. Please keep the 30-day processing provision for employment authorizations for asylum applicants.

AR001591



# PUBLIC SUBMISSION

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<b>Posted:</b> October 30, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0057

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I strongly oppose the removal of 30-day processing for employment authorization for asylum seekers. The DHS proposed a regulation that would seek to eliminate the 30-day processing time frame for USCIS to accept or deny an EAD application of an asylum seeker. According to DHS, the elimination of the time frame will ensure USCIS has enough time to receive, screen, and process applications, therefore, solving the problem of fraud. DHS believes the proposed regulation would allow USCIS to have sufficient time to account for the volume of applications while adjusting to current processes that protect against fraud and national security threats. The issue with this proposed regulation is that it does not take into account the consequences of the removal of the 30-day processing period. It will negatively affect the U.S. economy and asylum seekers. The solution I propose to the problem outlined by DHS is first, to focus on acquiring more resources for the service center operations rather than using all resources at the southern border. Second, DHS should propose a new regulation with a new interval that exceeds 30-days, since 30-days is believed to be outdated, therefore still requiring DHS to accept or deny an application in a timely matter. I demand that the USCIS withdraw this proposal immediately.

AR001592

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0058

Comment Submitted by Steffanie Lewis

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## Submitter Information

**Name:** Steffanie Lewis

**Address:**

1915 I St NW

Washington, DC, 20006-2118

**Email:** slewiis@iblf.com

**Phone:** 2022961111

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## General Comment

Terrible idea. It is very difficult for an person fleeing to the United States to simply exist for 160 days after filing for asylum. Considering it takes some time to prepare an asylum application, the fleeing person must somehow eat and find housing for minimally 4 or 5 months. Think of the pain caused by eliminating the deadline for processing an application for work authorization filed by an asylum seeker.

AR001593

# PUBLIC SUBMISSION

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<b>Posted:</b> October 30, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0059

Comment Submitted by Erika Kreider

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## Submitter Information

**Name:** Erika Kreider

**Address:**

1239 N 1 Ave

Tucson, AZ, 85719

**Email:** ekreider53@gmail.com

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## General Comment

I am very concerned about the proposal to remove the 30-day processing provision for initial work permits sought by asylum applicants from the regulations.

The inability to work and support oneself can be a disaster. There is the obvious loss of income. Which of course means loss of income to the community in which the asylee lives--as people who earn less money spend less money at community grocery stores and so on. With the loss of income comes food insecurity and housing insecurity.

Asylum applicants who have no legal source of income must rely on friends, relatives, and community members to support them and any family members. Donated funds are rarely sufficient to fully support an asylee--merely to help out. This in turn means less income to the community, as the persons supporting the asylum applicant cannot use their income for their own purchases.

The inability to work legally of course strengthens the underground economy. (By underground economy I mean the cash economy. I am not talking about the illegal economy.) This is basic as people must live, which includes paying for food, minimal transportation, minimal clothing and rent. And so they find work in the underground economy. The underground economy is not effectively taxed or regulated, for obvious reasons. Government action strengthening this would be most bizarre and contrary to governmental as well as societal interests.

Finally, there is the issue of mental health. Any person who loses a job and cannot find employment will be depressed. A person seeking asylum is one who, in many cases, has previously undergone serious harm and/or threats of serious harm, and may already be suffering from emotional abuse due to past persecution. To add to the emotional strains on that person/family by no longer requiring a speedy adjudication of a work permit application simply renders the situation more distressing. America does not stand for further victimizing asylum applicants.

This has been in the regulations for years. There is no benefit to removing the 30-day adjudication requirement.

AR001594

There are many disadvantages, to the asylum applicant, to the community, and to the government in removing the time requirement.

AR001595

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0060

Comment Submitted by Kayleen Hartman, Loyola Immigrant Justice Clinic, Loyola Law School

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## Submitter Information

**Name:** Kayleen Hartman

**Submitter's Representative:** Kayleen Hartman

**Organization:** Loyola Immigrant Justice Clinic, Loyola Law School

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## General Comment

To Whom It May Concern:

The Loyola Immigrant Justice Clinic respectfully submits this comment to the Department of Homeland Security's Notice of Proposed Rulemaking on Removal of 30- Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

Interest in the Proposed Rule:

As a community-based law school immigration clinic, we are deeply invested in advancing the rights and well being of the indigent immigrant population we serve. Our clinic works with many asylum-seekers, in both the affirmative and court-based asylum processes. For a host of reasons, from intense backlogs at our local asylum office to the unpredictable and increasingly far-out scheduling of immigration court dockets, our clients typically wait years before having a decision on their case. Being able to rely upon EADs in the interim is vital to ensuring that during that waiting period, they can be productive and self-reliant members of society. We have seen time and again that having an EAD reasonably quickly, and reliably, has made a world of difference to each client and their families. Our clients urgently need EADs to secure safe and stable housing, to feed and clothe their children, and to meet the basic necessities of their lives and be self-supporting as they await the adjudication of their request for relief from removal via asylum.

Comments:

EADs IMPROVE THE EFFECTIVENESS OF THE IMMIGRATION SYSTEM. Anything that slows down the EAD processing for asylum-seekers works against the effectiveness of the immigration system itself. The EADs

AR001596

enable our clients to successfully participate in their legal cases--to make interview dates because they can afford transportation, to work on their cases because they are able to pay to see doctors who help them stay healthy or regain their health. Without the ability to work, the anxiety our clients experience is crippling and detrimental to their legal cases.

**DELAYED EADs CREATE A COSTLY RIPPLE EFFECT:** Without an EAD and associated access to employment, asylum-seekers will have difficulty obtaining drivers licenses, banking services, healthcare, and legal counsel for their asylum applications. The Rule would cause significant financial hardship to asylum applicants who are unable to work and to those who depend on them financially - destabilizing the financial situation of persons already traumatized by the threats and persecution that led them to apply for asylum.

**FRAUD CONCERNS SHOULD NOT CAUSE DELAYS:** The concern voiced by DHS about fraud and national security should favor prompt decisions on EADs. If DHS has a concern about an individual, then it should quickly vet the application, rather than delay. DHS reports that it is now deciding over 99% of EADs within the 30-day processing timeline, demonstrating that DHS is generally able to address fraud and security concerns within the current timeframe and process.

**THE RULE BURDENS EMPLOYERS AND CHARITIES ALIKE:** Companies that would employ these asylum-seekers will either have insufficient access to labor or bear the costs of finding alternative labor. The Rule would burden and stretch the capacity of charities and non-profit service providers: if asylum-seekers are unable to obtain an EAD in a timely manner, they are forced to rely on other forms of support, including organizations that provide financial, housing, legal, or other forms of assistance.

**DELAYED EADs DELAY REVENUE TO LOCAL, STATE, and FEDERAL GOVERNMENT:** Local, state, and federal governments will lose income tax revenue from asylum-seekers who are delayed in entering the job market or forced to work in the shadow economy. DHS estimates that the annual Medicare and social security revenue loss to the government to be between \$39.15 to \$118.54 million dollars. DHS estimates the rule will cause asylum-seekers to annually lose \$255.88 to \$774.76 million in income.



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0061

Comment Submitted by Jane Makela

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## Submitter Information

**Name:** Jane Makela

**Address:** United States,

**Email:** janemakela@gmail.com

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## General Comment

This comment is in strong OPPOSITION to the proposed rule eliminating the requirement that an asylum seekers initial work permit (EAD) application be decided within 30 days. I am writing on behalf of Supporting Immigrant Tenants (SIT), a no-interest security deposit program of ProsperityMaine, with which I volunteer, but also as a pro bono lawyer assisting asylum seekers with the asylum process, and as a taxpayer.

Assurance of a rapid decision on an initial EAD application is critical to SITs mission of empowering asylum seekers to establish a basic level of personal and financial security through access to their own housing rather than being stuck in a homeless shelter while they wait to be able to work and support themselves . The financial institution we partner with has agreed to make these interest-free loans to immigrants as soon as they file their asylum applications and gives them a 10-month grace period before repayments begin: this makes business sense only because lender has confidence that within the 10 month period, the borrower can wait the 150 days that must elapse before an EAD application can be filed, file an EAD application, receive an EAD, and begin earning money to begin repayment. With this proposed rule change, that confidence disappears.

As a pro bono asylum lawyer, I can attest to the intense desire of this group of new immigrants to be gainfully employed and self-supporting. This is a population that does not want to be on welfare but actually welcomes the opportunity to become contributing citizens and taxpayers. It is essential to their dignity and a clear win-win situation for the asylum seekers and their families, the government assistance programs that otherwise must expend resources on their support, the taxpayers who support these government programs, whether at the federal, state or local level, and the employers who are desperate to fill jobs in this period of near record employment levels.

As a taxpayer, I am angered and offended by a policy that seems to be willing to forego millions in payroll tax revenue (not to mention other tax revenue that would result from asylum seekers spending their earned income)

AR001598

because we dont want to spend money hiring enough USCIS employees to keep up with processing EAD applications. I can only assume this short-sighted demonstration of cutting off our nose to spite our face is the product of anti-immigrant sentiment.

I urge that the entire rule be withdrawn or better yet rewritten to allow asylum seekers to file their initial EAD application along with their asylum application without a further waiting period. This would give the USCIS a generous 180 days to process initial EAD applications (consistent with the longstanding law that says asylum-seekers cannot get a work permit sooner than 180 days after filing their asylum applications). Everybody wins.

Jane Makela

AR001599

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0062

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

**Address:** United States,

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## General Comment

I am in disagreement with the proposed rule change that would remove the 30-day processing provision Asylum Applicant-Related Form I-765 Employment Authorization Applications. From what I have seen, it takes more than 30 days to get a response for the I-765 applications. However, some people are able to get their receipt in less than thirty days, which helps speed up the process of applying for an Employment Authorization Document (EAD). USCIS has this 30 day processing time rule, and they are still on backlog most of the time, causing most of the applications to be delayed and holding back peoples immigration cases. If the 30 day processing time was removed, the process would continue even slower, and the backlog of Employment Authorization Applications would slowly continue to rise. If the backlog of these applications gets to an uncontrollable amount, it will be hard to ever catch up, and it would be hard for people that are paying large amounts of money to be with status in the United States. I believe that hiring more workers for USCIS would be a solution, even if that means making people pay for the I-765 on asylum applications. From prior experience, I can say that people would be willing to pay more if that means they will get a decision quicker. Employing more people at U.S. Citizenship and Immigration Services (USCIS) would help reduce the backlog of applications, and it would allow people to get a quick response to the application that they (or their attorney) submitted. It would be wrong to remove the 30 day processing provision for many reasons, and if anything, removing this provision will lead to a more unorganized method. In this rule they are stating to remove the 30 day processing time because it is never met, and there is just backlog. However, if it is removed the back log would continue to grow, and the waitlist would be even larger than it is today. This does not affect anyone, but the person that is attempting to get their EAD, so they can get a job while they wait for a decision on their case. I believe hiring more workers, or potentially developing a more efficient way of reviewing applications would assist in reducing the backlog without having to remove the 30 day provision.

AR001600

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0063

Comment Submitted by Antonia Macias

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## Submitter Information

**Name:** Antonia Macias

**Address:**

PO Box 14222  
Seattle, WA, 98114

**Email:** amacias@maciasimmigration.com

**Phone:** 2065562190

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## General Comment

I am submitting my comment in opposition of the Removal of 30-Day processing Provision for Asylum Applicants. USCIS will lose millions of dollars that the individuals that are granted work authorization earn. Thousands of individuals will be impacted as they will be unable to work and provide income for their families that are also seeking asylum in the United States. Lastly, the elimination of the 30-day processing will financially harm both the asylum seeker and USCIS.

AR001601

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0064

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The proposed rule change to remove the 30-day processing provision for asylum applicant-related form I-765 is horrible and should NOT be implemented.

Asylum seekers already MUST wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

Asylum seekers are refugees. They are fleeing persecution. They are traumatized, and often alone. This is yet another attempt by the Trump Administration to hurt poor brown people. Reject the change.

AR001602

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0065

Comment Submitted by Karandeep Pawar, Pawar Law, LLC

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## Submitter Information

**Name:** Karandeep Pawar

**Organization:** Pawar Law, LLC

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## General Comment

I am Attorney Karandeep Singh Pawar of Pawar Law, LLC. I represent asylum seekers in Removal Proceedings. I believe the removal of 30 day processing provision for asylum applicant related to I765 is going to cause multiple issues.

**Harm Caused to Asylum Seekers.** Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

**Lost Tax Revenue for the Government.** USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

**Increased Delay Contrary to National Security Interests.** In the notice, USCIS makes frequent reference to a rise in national security threats as a reason to spend more time and resources on each decision. However, USCIS has reported that it has been able to decide over 99% of EADs within the 30-day timeframe for over the past year. Therefore, USCIS has proven its ability to adequately vet the amount of requests in a timely fashion. Moreover, its argument regarding increased threats serves only to prompt the need for a speedier process to properly protect national security, rather than its request to delay the process further. This need for a speedier process is further compounded by the fact that the EAD applicants are asylum-seekers already residing in the United States. If vetting must be done to prevent security risks, then having unvetted people in the U.S. subjected to a potentially

AR001603



indefinite review period seems contrary to the departments stated interests.

Part of a Systematic Effort to Deter Asylum Seekers. This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

Proposed Alternative: As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR001604

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0066

Comment Submitted by Diana Chamberlain

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## Submitter Information

**Name:** Diana Chamberlain

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## General Comment

My name is Diana Chamberlain. I am a practicing immigration attorney and represent asylum seekers before USCIS and EOIR.

This proposed rule should not be implemented. It is a misguided and unconscionable attempt to further build an invisible wall and to avoid our country's legal duty to protect asylum seekers. Specifically, this proposed rule harms asylum seekers and results in significant lost tax revenue.

**Harm Caused to Asylum Seekers.** Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

**Lost Tax Revenue for the Government.** USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

**Further Delay Unconscionable.** Asylum applicants must already wait 150 days to file for work authorization and then must wait at least another 30 days to receive work authorization. Additional delays in adjudicating these applications will call unnecessary and extreme harm to asylum applicants and their ability to support themselves and their families

AR001605

AR001606

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0067

Comment Submitted by Lori Walls

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## Submitter Information

**Name:** Lori Walls

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## General Comment

CIS reports that it has processed more than 99% of work authorization applications within the 30-day time period required. Its argument that a slower process will increase national security is specious--people in the U.S. who are seeking work authorization due to pending asylum applications already have been vetted. Moreover, the national-security argument makes no sense: biometrics appointments are a part of the work-authorization application process. Delaying the process would mean delaying biometrics for these individuals, increasing the risk to national security.

This administration already has made seeking asylum in the United States an arduous journey. It should not add further obstacles to asylum seekers, jeopardizing applicants' ability to work and support themselves here in the United States. The regulation requiring CIS to process work-authorization applications within 30 days should remain!

AR001607

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0068

Comment Submitted by Bill holston

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## Submitter Information

**Name:** Bill holston

**Address:**

2801 SWISS AVE

2719 Housley

Dallas, 75204

**Email:** bholston@hrionline.org

**Phone:** 2147690153

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## General Comment

I have provided pro bono legal assistance for asylum seekers for about 30 years. ALL of them want to be self sufficient and work. This has been a fundamental American value. It makes no sense at all to delay the opportunity to work, other than if this is an effort to dissuade persecuted people from seeking humanitarian relief in our country. If so that is wrong.

AR001608

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0069

Comment Submitted by Kathleen Weber

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## Submitter Information

**Name:** Kathleen Weber

**Address:**

9221 Roosevelt Way NE, #B  
Seattle, WA, 98115

**Email:** kathweber@aol.com

**Phone:** 2067837361``

**Fax:** 2067835261

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## General Comment

I am an immigration attorney in private practice. I have been an immigration attorney for more than 40 years.

I believe that it is very important for asylum seekers to receive their work authorization within the 30-day deadline. I believe that this is very important for the following reasons:

1. Many of the asylum seekers come with a dependent family member and the asylum seeker wishes to support themselves and their dependents. Having work authorization will allow them not to be a drain on their new community or on their other family members in the US. With a work permit, they will not need to seek public benefits because they prefer to work and to contribute to the community that they are in. Allowing asylum seekers to work allows for a smoother integration of them and their dependents into the local community.
2. Asylum seekers who have work authorization do not become homeless and their dependents do not become homeless.
3. Many asylum seekers have job skills and/or an interest in learning new skills, which helps promote safety and security in the community and helps protect against depression.

Thank you for your interest in reading my comments to the proposed change in regulations.

AR001609



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0070

Comment Submitted by Mary Neal

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## Submitter Information

**Name:** Mary Neal

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## General Comment

The regulation should not be changed. There are good reasons why employment authorizations for asylum applicants (category (c)(08)) should be processed expeditiously:

1. Applicants in this category are required to wait 150 days after they file their asylum application to request their first work authorization. Therefore, people in this category have already been living in the U.S. for five months and have been waiting often with no means of supporting themselves.
2. Applicants in this category have already provided biometrics (fingerprints) with their asylum application. They have also already provided the government with thorough biographical information in their asylum application. Therefore, the processing of the employment authorization should go quickly as the security and background screening has already been done.

Furthermore, again and again experience has shown that if USCIS is not held to deadlines by statute or by regulation, processing times creep up and up and applicants suffer without the benefits they are due.

AR001610

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0071

Mass Mail Campaign 1: Comment Submitted by Wendy Elizalde- Romero, Total as of 10/31/2019: 4

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## Submitter Information

**Name:** Wendy Elizalde-Romero

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## General Comment

This proposed rule is outrageous and it will harm asylum seekers and their families, and USCIS even estimates it will lead to \$100s of millions of lost tax revenue. There is no reason that USCIS cannot adjudicate these work permits within 30 days.

AR001611

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0072

Comment Submitted by Jacob McCoy

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## Submitter Information

**Name:** Jacob McCoy

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## General Comment

This rule would end up costing taxpayers more than it would for USCIS to simply follow its own rules as mandated. This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

AR001612

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0073

Comment Submitted by Nancy Vizer

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## Submitter Information

**Name:** Nancy Vizer

**Address:**

223 W Jackson Blvd, 725

Chicago, IL, 60606

**Email:** nvizer@vizerlaw.com

**Phone:** 3129571755

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## General Comment

This proposed change makes no sense, and is counterproductive for two reasons:

- This administration seems to believe that people who become public charges have no value to society. This proposed regulation would force able-bodied, fully employable asylum seekers, many of whom have physical or other injuries because of their trauma overseas, to become public charges. Unemployment is at an all-time low. These people will not take American jobs

- By proposing this regulation, you are broadcasting that you have not done security checks on asylum seekers whose applications have been pending for many months. If you had done security checks, the 765's would be very easily approvable. Why would you let these people, who have come forward voluntarily and given a great deal of information about themselves, remain in the United States for such a long period of time without background checks, when the president himself has classified them as gang members and "bad hombres"? The media will certainly pick up on this admission by the administration that it is allowing these people to go "unvetted" for such a long period of time.

AR001613

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0074

Comment Submitted by Lauren McClure

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## Submitter Information

**Name:** Lauren McClure

**Address:**

200 W Adams  
Suite 2211  
Chicago, IL, 60606

**Email:** lmccclure@krilaw.com

**Phone:** 3123322550

**Fax:** 3127820158

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## General Comment

I oppose the proposed rule because asylum seekers would lose wages and benefits as a result of delayed employment authorization card. This would affect their ability to support themselves and their families. This is harm to an already vulnerable community and this would mean more and more people being unable to afford the basics, housing, medicine, food, etc. Finally, the individuals would not be able to quickly obtain identification documents, which are needed for social services.

AR001614

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0075

Comment Submitted by Christopher Helm

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## Submitter Information

**Name:** Christopher Helm

**Address:**

6320 52nd Avenue South  
Seattle, WA, 98118

**Email:** chrishelm@dwt.com

**Phone:** 206-409-5766

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## General Comment

I am a lawyer working with immigrants, including those seeking asylum.

The proposed removal of the 30 day processing requirement will cause serious harm to asylum seekers who are already having to wait at least 150 days before they can apply for work authorization. Delays in work authorization means delays in getting pay and benefits to help support themselves and their families, and a greater strain on the many social service agencies that are helping asylees. It would also result in \$100s of millions of lost tax revenues to the government. If the change is required due to heavy work loads, USCIS can hire more workers or start accepting the applications earlier than the 150 day mark. USCIS reported that it was able to decide 99% of the cases with the 30 day time frame during the past year. So it is very possible, and it will not create an added security risk for the U.S.

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0076

Comment Submitted by Stacy Kowalski

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## Submitter Information

**Name:** Stacy Kowalski

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## General Comment

I work for a legal services non-profit that specializes in working with non-citizens. I believe that the removal of the 30-day processing provision for asylum applicant-related work permit applications is a bad decision for both the United States government and the asylum seeker. If the government believes that it needs more time to accurately, safely, and effectively process these applications, the solution is to allow the asylum seeker to submit the work permit application sooner, and allow the government longer to process the application, but still within a set amount of time. To fulfill the government's alleged purpose for the proposed rule, I propose that the rule instead allow applicants to file the I-765 at 120 days, and increase the government's permitted processing time to 60 days.

It is in the government's interest for asylum seekers to be able to work, legally. To begin, there is a labor market that benefits from this labor pool. It is in the government's interest that these positions are filled. Moreover, it is in the government's interest that asylum seekers perform this work with legal permission. This way, the asylum seeker may more easily pay taxes and the government can more easily regulate the enforcement of labor laws. In addition, it is in the government's interest that people are able to house themselves and feed themselves and their families. Without a possibility to work with lawful authorization, the government is leaving asylum seekers to wind up homeless and starving. Asylum cases can drag on for five, even ten years, many times at no fault of the applicant. For the reasons stated above, it is in the interest of this country that asylum seekers whose cases have been pending for 180 are eligible to lawfully work here. I am opposed to the promulgation of this proposed rule and admonish the government not to adopt it.

AR001616

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0077

Comment Submitted by Sandra Lewis

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## Submitter Information

**Name:** Sandra Lewis

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## General Comment

This rule change seems unnecessary, given that 99% of all of these EADs in the past year were completed within 30 days. We should not be unnecessarily delaying these people's ability to work. They are mostly very capable and are not taking jobs away from Americans. We should not extend the 30-day rule as it is not necessary and may actually be harmful by keeping these people from being able to work and contribute to our society. If there is a need for longer than 30 days (which does not seem necessary), then start the process earlier by reducing the 180-day waiting period so the asylum seekers can start working as soon as possible. They want to contribute to our society. If they are permitted to contribute to our society, they will bring up their children with respect for our society and gratitude we gave them a chance when their home countries did not. Future generation will be grateful for the way their parents and grandparents were treated and will likely become educated and be able to contribute to our society even more.

AR001617

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0078

Comment Submitted by Beth Stickney, Maine Business Immigration Coalition

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## Submitter Information

**Name:** Beth Stickney

**Organization:** Maine Business Immigration Coalition

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## General Comment

See attached file(s)

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## Attachments

Maine Business Immigration Coalition

AR001618



October 30, 2019

Submitted via [www.regulations.gov](http://www.regulations.gov)

Samantha Deshommes, Chief  
Regulatory Coordination Division, Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, DC 20529-2140

**Re: USCIS-2018-0001: Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications**

Dear Ms. Deshommes:

Please accept this public comment opposing the above-referenced proposed rule change that would eliminate the requirement that U.S. Citizenship and Immigration Services (USCIS) adjudicate I-765 applications by asylum seekers for their initial work permits within 30 days of receipt. I oppose the rule and ask the Department of Homeland Security (DHS) to withdraw it in its entirety. I ask that you incorporate by reference as integral to my comment all of the resources to which I cite or to which I include hyperlinks.

I am the director of MeBIC, which is coalition of Maine businesses, chambers of commerce, and associations that value immigration and understand its importance to Maine's communities and its economy.

Maine is the nation's oldest state, with deaths outpacing births, and a shrinking workforce as the "Baby Boom" generation ages and retires. In 2020, [15 years sooner than the rest of the nation](#), Maine is projected to reach the tipping point of having more Mainers over 65 years old than under 18 years old. Maine's workforce is shrinking at the same time that unemployment in the State is at record lows. Preliminary figures for August and September 2019 showed Maine's unemployment rate at 2.9 percent (and 1.9 percent in Cumberland County, the State's most economically robust county), and the rate statewide has been [below 4% for a record 45 months](#). Maine's labor shortage is reaching a crisis point, hindering business growth and causing some businesses to contract.

Immigrants are critical to Maine's ability to have a strong economy. In Maine, asylum seekers are a significant source of newcomers who stem our state's population declines. Estimates based on data from legal aid and other agencies indicate that Maine has about 6000 individuals with pending asylum claims, and 550-600 asylum seekers who do not yet have their work permits currently. Maine's experience with asylum seekers, who for at least the past decade

have come predominantly from Africa, is that they are highly educated, are eager to work, and have skills that Maine's employers and economy needs.

Their only impediment to becoming self sufficient and contributing to Maine's workforce and economy is the federal statute at 8 USC §158(d)(2), requiring them to wait 180 days before becoming eligible for a work permit. Shortening that delay will of course require action by Congress, and Maine's Representative Chellie Pingree has introduced legislation to that effect. If any change is to be made to the law, it should be to shorten the time that asylum seekers must wait before they can contribute fully, through work, to the country that they have chosen to make their new home, not to lengthen the delay.

However, the proposed rule change would do just that. By retaining the provision making asylum seekers wait to submit their initial work authorization applications until their asylum applications have been pending for 150 days, and eliminating the 30 day adjudication mandate, the proposed rule, as acknowledged in its preamble, will require the majority of asylum seekers to wait even longer to get their work permits than 180 days, and in some cases, several months longer, than the current regulation requires. Delaying the moment when asylum seekers who are ready, able, and willing to work can legally do so, robs them of dignity, and robs our economy of their contributions.

The proposed rule's preamble acknowledges some of the various harms that this rule change will cause, but underestimates them, and omits others.

First, work permits are often asylum seekers' only photo identification and are also required to get a Social Security card, which in turn is often essential to get into job training programs, to enroll in college, to get a driver's license, to open a bank account, and to take many other steps towards integration into a community.

Second, the proposed rule recognizes that that delaying issuance of work permits will cause economic harm to asylum seekers in the form of lost wages due to the delayed ability to begin working. The preamble notes that the rule change would cause asylum seekers lost earnings each year ranging from nearly \$256 million to \$775 million. However, that is an underestimate, given that the lower estimate assumes an \$8.25 minimum wage. Currently 28 states plus the District of Columbia have minimum wages exceeding that \$8.25 minimum, ranging from \$8.40 to \$14.00 per hour.

In addition, while estimating the lost tax revenue based on the lost earnings estimate, the proposed rule notes, but does not try to quantify the significant additional lost state income tax revenues. Nor does the proposed rule even mention that asylum seekers' earnings are spent in their local communities, so that their lost income translates into lower spending on rent, food, and consumer goods, with the corresponding lost profits and tax revenues that those expenditures would generate.

The proposed rule's preamble also notes, but fails to quantify the cost to businesses in lost productivity and profits for not having access to asylum seekers, as members of the legally authorized workforce, sooner. With job openings exceeding job seekers by more than a million for far longer than a year, the labor force shortage is a critical issue for employers. This is not an impact that should be minimized, as the proposed rule's preamble does.

Apart from the very human harm and the economic costs that the proposed rule would cause, it is also contrary to the Administration's stated efforts (for example, with its recent revised "public charge" rule) to ensure that immigrants will be self-sufficient without the need for public supports. By further delaying when asylum seekers will get their initial work permits, the proposed rule will force them to depend on community charity and public benefits for survival for a longer period than the already lengthy statutorily required 180 days. The rule's preamble acknowledges this when it states that the change would put additional demands on asylum seeker's support systems, but fails to acknowledge how this is antithetical to promoting the administration's "self-sufficient" immigrant goal.

The proposed rule states that an increased volume of asylum seekers, and corresponding increase in the number of initial work permit applications, plus a percentage of applications that require additional "vetting" makes it impossible for USCIS to meet the current regulation's, and current court order's mandate to adjudicate these applications in 30 days without hiring additional staff, which the preamble to the rule states that administration declines to do. DHS's rationale that hiring staff requires time for onboarding and training, and won't immediately alleviate the timely processing challenges is no excuse for not pursuing that as the best solution to the stated problem.

However, if the need for more time to process asylum seekers' work permit applications is indeed the rationale behind the proposed rule change, there is an alternative way to give USCIS more time that won't result in the majority of asylum seekers (53%, based on FY 2017's performance as cited in the proposed rule) waiting longer than 180 days after filing their asylum applications (or 30 days after filing their I-765 applications) to get a decision. DHS could replace its current proposed change with language eliminating the requirement that asylum seekers cannot file their I-765 applications until their asylum applications have been pending for 150 days, and specifying instead that asylum seekers can file their work permit applications concurrently with their I-589 asylum applications. That would give USCIS a full 180 days to adjudicate each application, which, according to the FY 2017 processing times referenced in the proposed rule's preamble, would be enough time to process over 96% of all the initial asylum seekers' work permit applications received.

I strongly oppose this proposed rule change. It should be withdrawn, and USCIS should hire additional adjudicators in order to meet the 30 day processing mandate. If not withdrawn, the proposed rule should be entirely rewritten, substituting a proposal to allow asylum seekers to file their initial work permit applications with their asylum applications, achieving the stated goal of the proposed rule - to give USCIS more time to make decisions - without further harming asylum seekers and the economy.

Very truly yours,

Beth Stickney, Esq.  
Executive Director

AR001628

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> October 31, 2019
<b>Tracking No.</b> 1k3-9d1e-5qs6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0079

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am an immigration attorney and have been practicing for more than 10 years. I am very concerned with the proposed rule to remove the 30-day processing provision for asylum employment authorization documents (EADs) for multiple reasons.

Delays in processing work permits, especially for already vulnerable asylum applicants, can have significant effects on their ability to support themselves. Also, the sooner that an EAD is issued, the quicker an applicant can find gainful employment and pay employment/payroll taxes to the IRS. I believe it would be in the best interest of the applicant, and the government, to process these applications as quickly as possible so that the applicant has the best opportunity to find employment and become self sufficient.

One especially germane point is that an applicant must ALREADY wait at least 150 days before they can apply - unlike many other EADs which can be requested the day the underlying application is submitted - and an EAD can only be granted after 180 days. If further processing time is needed, for example 90 days, a reasonable alternative would be to allow applicants to apply after waiting 90 days. This would allow the government more time to process the application and not negatively affect the applicant.

AR001622



# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k3-9d1e-mpiz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0080

Comment Submitted by Michael Jarecki, Jarecki Law Group, LLC

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## Submitter Information

**Name:** Michael Jarecki

**Address:**

53 W. Jackson Blvd. Suite 1515

Chicago, 60604

**Email:** mike@jareckilaw.com

**Phone:** 17735039314

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## General Comment

I am the principal of Jarecki Law Group, LLC, a U.S. immigration law firm. Since 2006, we have represented dozens of asylum seekers and have won nearly all of the cases we have filed before USCIS asylum offices or EOIR Immigration Courts. The cases we present to USCIS and EOIR are legitimate and real. The EAD that pending asylum seekers obtain after 150 days, both due to USCIS delay and long court hearing dates, allows asylum seekers to work and provide for themselves and often times other family members. It allows them to earn money to pay for legal fees and to seek other services such as therapy to deal with past and current trauma or other factors such as coming out of the closet as a member of the LGBT community. Statistics show that those with legal representation have higher percentages of chances to be granted asylum, underscoring the very legitimate need to pay for qualified legal representation as the government does not provide for lawyers in these types of cases. Monies also go to therapists as mentioned and the payment of country conditions experts, all of which are important elements of an asylum case.

In the end, this rule is part of a systematic effort to deter asylum seekers and ensure they cannot hire qualified legal representation to navigate them through the very complex asylum process or hire the experts they need to support their cases.

This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process

AR001623

more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

AR001624

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0081

Comment Submitted by Alen Takhsh

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## Submitter Information

**Name:** Alen Takhsh

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## General Comment

In the notice, USCIS makes frequent reference to a rise in national security threats as a reason to spend more time and resources on each decision. However, USCIS has reported that it has been able to decide over 99% of EADs within the 30-day timeframe for over the past year. Therefore, USCIS has proven its ability to adequately vet the amount of requests in a timely fashion. Moreover, its argument regarding increased threats serves only to prompt the need for a speedier process to properly protect national security, rather than its request to delay the process further. This need for a speedier process is further compounded by the fact that the EAD applicants are asylum-seekers already residing in the United States. If vetting must be done to prevent security risks, then having unvetted people in the U.S. subjected to a potentially indefinite review period seems contrary to the departments stated interests.

AR001625

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0082

Comment Submitted by Margaret Legowski

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## Submitter Information

**Name:** Margaret Legowski

**Address:**

Legowskishop@gmail.com

Washington, DC, 20024

**Email:** Legowskishop@gmail.com

**Phone:** 202257-4279

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## General Comment

I STRONGLY oppose removing the 30-day cap on processing work permits for those seeking asylum. We need the skills of the people affected by this rule; they need the dignity of work, particularly given the circumstances that required them to flee their homes. This is a moral question for me - we need to help restore human dignity. It is also an economic one: working asylum seekers contribute to our economy. The sooner they can work, the better for them AND for us.

SHAME ON YOU for trying to change this!

AR001626

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0083

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Asylum seekers are almost always coming to us in a precarious financial position, having fled for their lives. Delays in getting their work authorization put them at even greater risk. There is no benefit to putting our most vulnerable neighbors at risk of not being able to have the food or shelter they need. I believe this also puts their mental health in jeopardy as they are already in fear of the persecution they fled. Once they are here they may feel safe from their situation in their home country, but are now facing new challenges including worry about being able to survive in the United States for a period of time without being able to work. This situation would greatly challenge anyone, and there is no valid reason not to give them work authorization as soon as possible once it is due to them.

AR001627

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0084

Comment Submitted by Glorily A. Lopez

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## Submitter Information

**Name:** Glorily A. Lopez

**Address:**

33 East Main Street

Suite 500

Madison, WI, 53703

**Email:** glopez@murphydesmond.com

**Phone:** 608-270-5550

**Fax:** 608-257-2508

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## General Comment

I would encourage the administration to keep predictable Employment Authorization Document (EAD) cards issuance for pending asylum applicants. Our government should encourage legal employment of asylum applicants, so they can pay taxes and contribute to our country while their cases are resolved. This new rule will harm asylum seekers and their families and by some estimates it will lead to \$100s of millions of lost tax revenue.

AR001628

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0085

Comment Submitted by Erin Cobb

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## Submitter Information

**Name:** Erin Cobb

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## General Comment

I am opposed to this regulation. DHS should maintain the 30-day processing provision for asylum application-related Form I-765 Employment Authorization Applications.

Within this proposed rule, USCIS admits it has not undertaken to study the impact of hiring more officers, either on adjudication times, costs to the agency, or in other ways. Rather than undertaking this study, the agency is attempting to shortcut around its obligations and put the burden on the backs of asylum seekers, the most vulnerable of any class of immigrants or migrants.

Asylum-seekers must already wait 150 days after filing their application to even submit an application for employment authorization; no other class of applicants are subjected to a similar mandatory waiting period. Applicants should not be made to wait even longer. Already this waiting period causes significant hardship to applicants, as most enter the United States without close family to support them. This administration states that it greatly values immigrants who contribute to the economy, but with this proposed rule, DHS is restricting the ability of asylum-seekers to meaningfully participate in the economy.

In addition, USCIS greatly underestimates the amount of time the agency would actually take to process EADs for asylum applicants were this regulation promulgated. The agency claims it will take about 78 days to adjudicate EADs; however, when DHS removed the time restrictions for other classes of EADs, the processing times ballooned from three months to as much as \*eleven\* months! (Please see current processing times of I-765s at the National Benefits Center, "All other employment authorization applications - 11 months). If the agency really were going to take 78 days or less to adjudicate the EADs file by asylum applicants, then let it put that deadline into the regulations, rather than removing any deadline at all. A federal agency's stakeholders must be able to hold the agency accountable. Removing the time limit for EAD processing will remove any accountability of the agency.

AR001629



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0086

Comment Submitted by Edward Mendez

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## Submitter Information

**Name:** Edward Mendez

**Address:**

5 Saint Moritz Ave

Unit 101

Palos Park, IL, 60464

**Email:** emendez@jareckilaw.com

**Phone:** 312-319-4201

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## General Comment

As a result of the Rosario litigation, USCIS is now adjudicating initial asylum EAD applications within 30 days. In response, USCIS has proposed to simply eliminate the 30-day deadline.

This rule will harm asylum seekers and their families, and USCIS even estimates it will lead to \$100s of millions of lost tax revenue.

AR001630

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0087

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Seeking asylum is a basic human right enshrined both in US legislation and the Universal Declaration of Human Rights. It is unconscionable that we are currently denying asylum seekers the ability to present at our southern border. It is worse still that we should deny those who are awaiting a decision from within the US the ability to be self-sufficient. These are the very arguments we have made time and time again to foreign governments such as Jordan and Lebanon, beseeching them to allow Syrian refugees the ability to work. The proposed rule is not only cruel, it makes us hypocrites. It defies logic that an administration so singularly obsessed with 'public charge' should wish to force asylum seekers to become dependent on other supports. It is so incredibly small and petty of a country which has the ability to be a world leader to further punish victims fleeing war and other atrocities. We are bigger than that. We are better than that. If it is concerned about wait times, USCIS could allow asylum seekers to apply earlier -- which would help both sides of this equation. I truly believe you, who are reading this right now, believe in the mission of USCIS to administer an immigration system that is fair and to uphold our shared American values. Please consider the undue, senseless harm this will cause.

AR001631

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0088

Comment Submitted by Matthew Wiertel, Esq.

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## Submitter Information

**Name:** Matthew Wiertel

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## General Comment

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue NW  
Mailstop #2140  
Washington, D.C. 20529-2140

DHS Docket No. USCIS-2018-0001  
84 F.R. 47148

October 31, 2019

To Whom It May Concern:

I respectfully submit this comment to the Department of Homeland Security's Notice of Proposed Rulemaking on Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

Interest in the Proposed Rule:

I currently serve as a Staff Attorney at Journey's End Refugee Services, a non-profit refugee resettlement agency located in Buffalo, NY. Our Legal Services Department routinely assists asylum-seekers via non-retained consultations, pro se assistance, and direct representation at both the affirmative and defensive stages. Please note that this comment is not being submitted on behalf of my organization, but rather, I am submitting it as a concerned U.S. citizen with first-hand experience in working with asylum-seekers.

AR001632

Bona fide asylum-seekers who make their asylum claims at the southern border of our country tend to arrive at the ports-of-entry with few physical possessions and little or no money. While their asylum applications are pending, asylum-seekers typically have their basic necessities maintained by the generosity of various non-profit and charitable organizations. The limited resources available at such organizations are stretched even further in an effort to accommodate as many asylum-seekers as possible. It is essential that those pending asylees who are capable of obtaining employment be able to do so in order to help maintain themselves and relieve the pressure on the supporting organizations.

The influx of asylum-seekers that DHS now argues is overwhelming its capacity to process (c)(8) EADs within 30 days is similarly overwhelming the capacity of shelters and similar organizations to provide the basic food, clothing, shelter, hygiene, education, medical care, and legal counsel needed by those waiting for their asylum claims to be adjudicated. Even with (c)(8) EAD applications being adjudicated within 30 days of receipt, with the 150-day pending I-589 prerequisite, that totals 180 days. This also does not take into account the fact that most asylum-seekers do not file their I-589s immediately; it takes time to complete the form and submit it with all required documentation. This means that most asylum-seekers are unable to work in the U.S. for at least 7 months, but commonly longer. The difficulty in maintaining one's basic standard of living for such a protracted amount of time is evident.

Prolonging the wait to receive the ability to lawfully work is to the significant detriment of lawful asylum-seekers and those who struggle to assist them. This proposed rule change is clearly a cruel attempt to exacerbate the suffering that asylum-seekers have already endured by making it more difficult to maintain a basic standard of living while their cases are pending. This proposed rule change is aimed at increasing the stress upon asylum-seekers and those who support them in a nakedly shameful effort to dissuade those persecuted on the basis of their race, religion, nationality, political opinion, and/or membership in a particular social group from seeking asylum in the first place, and to encourage those already in the U.S. to abandon their claims and return to their respective countries of persecution.

Folks who have filed their I-765 are attempting to gain the ability to seek lawful employment in the U.S. so that they may support themselves while they await the adjudication of their I-589; they are not trying to remain in the U.S. illegally by "disappearing into the wind." These are human beings who - simply due to the unfortunate circumstance of birth - have endured harrowing and lengthy journeys in order to lawfully apply for asylum in the U.S. These are desperate people who do not want to seek employment illegally or turn to criminal conduct in order to survive.

DHS/USCIS has already demonstrated the ability to adhere to the law and finalize these EAD applications within 30 days at a rate of 99% - it should be a processing protocol that the department and its agency are proud of. I strongly encourage you to withdraw this proposed rule and permit the 30-day standard to continue.

Regards,

Matthew J. Wiertel, Esq.

AR001633

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0089

Comment Submitted by William Quiceno

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## Submitter Information

**Name:** William Quiceno

**Address:**

332 S. Michigan Ave 1428

Chicago, IL, 60604

**Email:** williamq@klc-ltd.com

**Phone:** 3123419730

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## General Comment

I am against this change as it is harmful to asylum seekers and to the U.S. economy. I represent immigrants and many of these asylum seekers are fleeing persecution and terrible life threatening circumstances. The U.S has long been a beckon of hope for protection and they should have the ability to work legally while their cases are being processed. It prevents them from living in the shadows and being abused of U.S. employers. It also helps the U.S. economy and tax base to have them work legally and helps sustain and fund our social security administration. As a Christian we are taught to help the poor and the stranger and this change goes against Christian ideals. Therefore, taking this long established right will be harmful to both the asylum seeker and overall U.S economy.

AR001634

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0090

Comment Submitted by Catherihne Shaw

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## Submitter Information

**Name:** Catherihne Shaw

**Address:**

1763 Columbia Road NW

Apt 508

WASHINGTON, 20009-2834

**Email:** c\_shaw26@yahoo.com

**Phone:** 2022361897

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## General Comment

I do NOT support the proposed change to the law, for it defies common sense. If new people to our country are to be self-sufficient, they have to have permission to work. If not, they cannot contribute to our economy nor pay taxes. Immigrants' taxes support many social services programs that we all enjoy now and even more so in the future; they are the future of our labor force. Please use common sense and approve immigrants' work permits as fast as possible, within 30 days. Thank you,  
Catherine Shaw

AR001635

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d1r-mies
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0091

Comment Submitted by Shelly Principe

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## Submitter Information

**Name:** Shelly Principe

**Address:**

835 Geneva Pkwy North #2

Lake Geneva, WI, 53147

**Email:** sprincipe@principeimmigrationlaw.com

**Phone:** 2623489050

**Fax:** 2622485177

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## General Comment

I respectfully request that the USCIS proposal to eliminate the 30-day deadline for adjudication of work authorization/I-765 for asylum applicants not be implemented. Frankly, USCIS adjudications are at an all-time high in terms of processing times, whether for nonimmigrants, immigrants, and naturalization. This particular class of applicants are vulnerable already. Not being able to work on a timely basis is just simply bad policy and makes no sense.

The bottom line of this rule is it will harm asylum seekers and their families. USCIS even estimates it will lead to \$100s of millions of lost tax revenue. If this is the case, why do it other than to torment people who have already experienced devastating hardship, loss and persecution just because of who they are. The whole point of the asylum process is to help these people, not put up more barriers to having a happy and productive life.

AR001636



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0092

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The Congress of the United States of America has overwhelmingly failed to structured a fair Immigration law. For this reason, smugglers mafias have made thousands of dollars in revenues by putting immigrants at risk. Selling the American dream, bringing entire families over this country. Continuing to provide work permit without proper vetting, proper investigation it's irresponsible & it's encouraging economic asylum seekers to risk their lives. USCIS must have enough/plenty of time to investigate each cases. 30 days isn't enough. Also, it's unfair for legal immigrants & real asylum seekers to be put on hold.

AR001637

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0093

Comment Submitted by Gina Reynolds

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## Submitter Information

**Name:** Gina Reynolds

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## General Comment

This rule will harm asylum seekers and their families. USCIS estimates it will lead to hundreds of millions of dollars in lost tax revenue, which hurts all US citizens.

AR001638

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0094

Comment Submitted by Jeanne Rossomme

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## Submitter Information

**Name:** Jeanne Rossomme

**Address:**

3715 Kenilworth Dr  
Chevy Chase, MD, 20815

**Email:** jeannerossomme@gmail.com

**Phone:** 2022570663

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## General Comment

I am an active member of our church's group to help migrants. For the past year we have been helping a young man from Nicaragua, Mario, who is seeking asylum after protesting the current authoritarian government there. This young man is full of faith and has followed every requirement to the letter. He has even lived with our family for 5 months while awaiting his asylum scheduling hearing. Due to the government shutdown and procedural missteps by the US Immigration system, Mario has only now some 14 months after his asylum application been able to apply for a work authorization. During that time our church has supported him with housing, food, transportation and medical care.

During this time waiting, Mario (who is an engineer) has been taking technical (IT) classes and has passed certifications. Mario also helps others in his situation via translating, supporting and connection to free training resources. He is a positive person who always believes in God's plan regardless of the many months of waiting and setbacks.

Our church budget assumed that in 6 months we could assist others in need. Mario in fact has several job offers for his needed technical skills but he cannot accept any of these offers until he receives his work authorization. This new rule will make the process even more lengthy and unfair.

This rule hurts asylum seekers like Mario who are legitimately waiting in a safe place till their court hearing (now with a 4 year wait).

This rule hurts employers who are looking for skilled and eager workers, like Mario.

AR001639

This rule provides LESS tax revenue by now letting people pay taxes on their income.

This rule hurts caring organizations like our church who are basically supporting someone who can and wants to support himself - but cannot only due to an inefficient procedure.

I request that you do not remove this rule but instead focus on streamlining the system so it works and legal immigrants can contribute to this country that they want to call home.

AR001640

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0095

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Asylum applicants are required to wait six months after the filing of their application to apply for work authorization. These people are often suffering from trauma and are under extreme financial stress after fleeing their country of origin. Not prioritizing these applications for adjudication after such a waiting period only serves to increase the hardship they experience. USCIS must prioritize these applications to allow asylum applicants to begin to support themselves and their families in the United States.

AR001641

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> October 31, 2019
<b>Tracking No.</b> 1k3-9d1t-dfje
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0096

Comment Submitted by Alycia Moss

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## Submitter Information

**Name:** Alycia Moss

**Address:**

902 E Coeur D Alene Ave

Coeur D Alene, ID, 83814

**Email:** [alycia@mossimmigrationlaw.com](mailto:alycia@mossimmigrationlaw.com)

**Phone:** 2087713405

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## General Comment

As an immigration attorney I do many asylum applications and they can take from 2-4 years to complete. While my clients wait they would like to support themselves, therefore, applying for work authorizations is imperative. The longer an applicant has to wait the more likely they will need public services like financial assistance and food stamps. As our government is trying to reduce the amount of immigrants who can access these public services, this regulatory chance would accomplish the opposite of that. Moreover, we are re-traumatizing those we are trying to help.

Delays in receiving work authorization can lead to:

1. Lost income to the asylum seeker and their family
2. Food insecurity
3. Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID.
4. Risk of homelessness/housing insecurity
5. Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify)
6. Vulnerability to exploitation, trafficking, and underground economy risks
7. Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income)
8. Loss of ability to support themselves and their families
9. Feelings of fear, desperation, and overall mental health concerns

AR001642

Please reconsider this regulation. If you must increase the processing times, please consider allow applicants to apply for work authorization after 90-days and then allow for 90-days of processing.

Thank you!

Alycia

AR001643



# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0097

Comment Submitted by Chris Christensen

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## Submitter Information

**Name:** Chris Christensen

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## General Comment

This change will not only hurt people fleeing violence in their countries of origin, but it will also have a terrible impact on the US economy. I strongly impose these changes.

AR001644

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> October 31, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0098

Comment Submitted by Mari Matsumoto

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## Submitter Information

**Name:** Mari Matsumoto

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## General Comment

Rather than promote autonomy, independence and assimilation, the proposed changes would force asylum seekers to remain dependent on social networks in the United States. Frequently asylum seekers who have not received work permits must rely on dubious loans from community members and must shuffle their family from the couches of extended family, being effectively homeless. The safety and security of the family depend on being able to seek honest work, afford their own housing and keep children out of contact with unsafe shared living situations.

If asylum seekers must wait an extended period for their work permits and must shuffle from the homes of extended family or friends in the US without the ability to set down roots in an area, children cannot remain in one school and parents cannot have a stable address at which to receive USCIS and EOIR correspondence so that they dont miss an interview or hearing. There is simply no rational basis for eliminating the regulation requiring the prompt issuance of work permits for asylum seekers. I have represented many asylum seekers over my 12 years of immigration law practice. Obtaining work authorization is the first step toward stability and safety for a family.

I urge the agency to reject the proposed regulation.

AR001645

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0099

Comment Submitted by Linda Rabben

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## Submitter Information

**Name:** Linda Rabben

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## General Comment

I am a professor at the University of Maryland. In the past I worked for a refugee resettlement agency, and I help asylum seekers as a volunteer. I am very concerned about the proposed change to work permit rules for asylum seekers, which would make it harder for them to obtain a work permit in a timely manner and support their families and would prevent them from making valuable contributions to our economy and society.

Seeking asylum is a basic human right enshrined in US and international agreements that we have signed onto. The asylum seekers I've known and helped over the past 20 years have fled from severe persecution. Many of them are skilled workers and professionals, including physicians, engineers, teachers and accountants. They have had to wait months or years for their cases to be decided. In order for them to survive they must be able to work while they wait.

It is common sense to facilitate their ability to work, pay taxes and contribute their skills and experience to our country. Making it harder for them to obtain work permits would harm them, their families and their communities.

For example, a friend of mine is an asylum seeker and a CPA. She had to flee her country because of political persecution. She has been waiting for about 3 years for her asylum case to be decided. While she was waiting to become eligible to apply for a work permit, she became destitute. Fortunately she found friends who helped her survive this difficult period. As soon as she obtained the work permit she looked assiduously for work and found a job in her professional area. She's a useful member of our community. I could provide many more examples of asylum seekers who are struggling to survive and thrive in our country. We need their talents and skills.

I hope USCIS will find a better way to deal with asylum seekers who are capable of making positive contributions to our society. The time they have to wait to apply for a work permit should be shortened, not lengthened. This change would be in our national interest as well as a humane measure for people fleeing persecution, torture, death threats and other human rights violations in their home country.

Delays in issuance of work permits could lead to many adverse consequences, including lost income, food insecurity, inability to obtain necessary ID, risk of homelessness, inability to obtain medical health insurance, vulnerability to exploitation and trafficking, lack of access to social services, and harm to mental health. It's not only morally right but economically sensible and legally necessary to facilitate asylum seekers' ability to work.

AR001646

AR001647

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0100

Comment Submitted by Brian Olson, World Relief Spokane

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## Submitter Information

**Name:** Brian Olson

**Address:**

1522 N. Washington St.

Suite 204

Spokane, WA, 99201

**Email:** bolson@wr.org

**Phone:** 509-321-1882

**Organization:** World Relief Spokane

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## General Comment

My name is Brian and I work with World Relief in Spokane, WA.

Since the removal of the 30-day processing provision for asylee seekers makes no good economic or practical sense, I would hope that it will NOT be changed from the current policy.

I work with immigrants and refugees, helping them find employment.

So many of our local businesses need the workers that we assist.

Many of our clients fill the jobs that others do not want to take. Housekeeping, care giving, janitorial, certain manufacturing.

Lengthening the time that a person will be able to work legally just makes no sense.

I hope that this new policy idea will be a thing of the past.

Let's keep making good economic choices that can benefit our country.

Sincerely,

Brian Olson

World Relief Spokane

AR001648

AR001649

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d1u-vm4c
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0101

Comment Submitted by Emily Headings

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## Submitter Information

**Name:** Emily Headings

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## General Comment

I strongly oppose DHS's proposed rule to roll back the current regulation requiring adjudication of asylum seekers' EAD applications in 30 days. I am an immigration attorney and have interacted with and known many asylum seekers. I am thus very aware of the importance of an asylum seeker's ability to work while their asylum application is pending, whether in court or at the asylum office. Given the long back logs in both forums, it is even more imperative that asylum seekers be allowed to work sooner rather than later. Being able to subsist for even 5 months, until they are eligible to apply for a work permit, is already challenging. Having to wait an additional, indefinite period worsens an already difficult time for asylum seekers and their families. Removing the 30-day deadline also flies in the face of other purported concerns of the Administration. For example, DHS is clearly concerned with immigrants becoming public charges and has expended significant tax dollars to expand this definition. Although asylum seekers are not subject to this inadmissibility ground, not being able to work right away can make asylum seekers dependent on the government subsidies, which in effect contradicts the Administration's efforts to reduce the number of public charges. Already, the chilling effect of misinformation around public charge has prevented asylum seekers from seeking benefits for themselves and in some cases their US citizen children, benefits they are eligible for. This proposed rule to slow down issuance of work permits for asylum seekers makes no sense. From both a humanitarian and logical perspective, this rule should not go into effect.

AR001650



# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0102

Comment Submitted by Melissa Abbott

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## Submitter Information

**Name:** Melissa Abbott

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## General Comment

My name is Melissa Abbott and I work as a DOJ Accredited Representative at World Relief Immigration Legal Services in Spokane, WA. I work directly with Asylum Seekers in their process of applying for Asylum as they fear returning to their country of origin where they will be undeniable persecuted or killed. These individuals are the most hard working and resilient people I have met. They are forever grateful for the safety they have found in the United States and desire to give back to this country by working, paying taxes and never rely on public benefits. They want to be able to work legally and provide for their families as soon as possible.

This proposed change would delay hard-working asylum seekers in their desire to be self-sufficient, pay taxes, work legally and provide for their families. This change appears to be another step in the systematic effort to deter asylum seekers. This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

AR001651

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0103

Comment Submitted by Cindy Conlin

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## Submitter Information

**Name:** Cindy Conlin

**Address:**

737 Shadowmere Ct

Fort Collins, CO, 80526

**Email:** cindyconlin@gmail.com

**Phone:** 8015977903

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## General Comment

I oppose this rule because it has the net effect of delaying asylum seekers' ability to legally work to support themselves. My church is currently helping asylum seekers, and we fundraise to pay for their expenses while they wait for a work permit. The 5 months they must currently wait to apply for a work permit is often wasted time when they are bored (although we enroll them in English classes and help them build relationships to integrate into the community during this time). If USCIS needs more time to process the work permit, it should allow the asylum seeker to apply earlier in the process (such as at the same time as submitting the asylum application instead of the current 5 month wait). This policy proposal, and also the current law that mandates a minimum 6-month wait for a work permit is harmful to the many legitimate asylum seekers coming to our country, forcing them to either work illegally to survive during the waiting period, or be supported by a church or other organization like mine.

AR001652

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0104

Comment Submitted by Mike Anonymous

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## Submitter Information

**Name:** Mike Anonymous

**Address:**

Arlington, VA,

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## General Comment

I volunteer to accompany families who are seeking asylum, and I am opposed to proposed rule which would remove the 30-day processing provision for Asylum Applicants.

This rule will harm asylum seekers and their families, and USCIS even estimates it will lead to \$100s of millions of lost tax revenue.

AR001653

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0105

Comment Submitted by Aaron Lawee

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## Submitter Information

**Name:** Aaron Lawee

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## General Comment

I am writing to oppose eliminating the requirement that I-765 applications for asylum seekers be adjudicated within 30 days. By nature, asylum seekers have fled their home countries due to fear of persecution. They likely did not come to the United States with extra resources and may not have family here to help support them. It is cruel to prevent an asylum seeker from working lawfully, especially considering that an asylum seeker must wait 150 days before even applying for a employment authorization. If 30 days is not enough time to adjudicate an application, then I propose that asylum be eligible to apply for work authorization sooner. For example, applicants for adjustment of status can apply for work authorization concurrently with their application. Why not allow asylum seekers to do the same? Additionally, if someone wants to work, our country should encourage that. With a work permit, they will get a social security number and will more easily be able to pay taxes and contribute to the United States. Finally, is it the policy of this administration that asylum seekers should NOT be allowed to legally support themselves? Applying for asylum is a right under US and international law. We are a nation of immigrants, and many many U.S. citizens are descendants of people who fled persecution, including my own father (who immigrated to the United States and started a successful business). Our country would not be what it is today if people coming here legally, in compliance with our laws (such as asylum seekers), were prevented from supporting themselves.

AR001654

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0106

Comment Submitted by Oasis Legal Services

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## Submitter Information

**Name:** Anonymous Anonymous

**Submitter's Representative:** Ari Jones

**Organization:** Oasis Legal Services

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## General Comment

Please see attached document for complete comment in opposition--

Oasis Legal Services strongly opposes this proposed rule and revocation of the 30-day processing provision for initial EADs for asylum applicants.

Summary of issues:

The Rule would burden and stretch the capacity of charities and non-profit service providers: if asylum-seekers are unable to obtain an EAD in a timely manner, they are forced to rely on other forms of support, including organizations that provide financial, housing, legal, or other forms of assistance.

The Rule would cause significant financial hardship to asylum applicants who are unable to work and to those who depend on them financially, thus destabilizing the financial (and therefore health, housing, and so forth) situation of persons already traumatized by the threats and persecution that led them to apply for asylum.

The Rule would burden and stretch the capacity of charities and non-profit service providers: if asylum-seekers are unable to obtain an EAD in a timely manner, they are forced to rely on other forms of support, including organizations that provide financial, housing, legal, or other forms of assistance.

Government entities will lose tax revenue, and employers will lose profits garnered through the employment of asylum seekers and the purchasing power of asylum seekers. Companies that would employ these asylum-seekers will either have insufficient access to labor or bear the costs of finding alternative labor.

AR001655

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0107

Comment Submitted by Mark Finney

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## Submitter Information

**Name:** Mark Finney

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## General Comment

Dear USCIS,

I am a pastor part-time and I also work full-time at a social services agency in Spokane, WA. Ive worked with numerous asylees over the past 3 years. It is extremely challenging for them to survive until they receive their EAD work authorization. The proposed rule change would be devastating and unusually cruel for people who have already proven they are legally eligible to be protected in America because of persecution in their countries of origin. Some asylees suffer great hardship because of the lack of ability to work in their first 5 months in the country. Extending the processing time for their EADs beyond 30 days is unconscionable. Its also terrible policy in that it prevents these work-ready laborers from entering the workforce in a timely fashion. Businesses will be unnecessarily burdened to wait longer for qualified workers in an economy that already suffers a labor shortage. Government agencies will lose out on tax revenue that asylees could be paying if they were employed. There is no good reason to change this rule. And plenty of bad effects that make it clear that changing this rule is detrimental to our nation, our economy, and those our laws have bound for us to protect with the process of asylum.

Thank you for your thoughtful and wise decision to prevent this rule change.

Sincerely,

AR001656

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> October 31, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 01, 2019
<b>Tracking No.</b> 1k3-9d20-sjsl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0108

Comment Submitted by Colin Mathewson

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## Submitter Information

**Name:** Colin Mathewson

**Address:**

St Lukes Church

3725 30th Street

San Diego, CA, 92104

**Email:** colin@stlukesnorthpark.org

**Phone:** 6199778173

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## General Comment

I am an Episcopal priest of a congregation that is majority Sudanese and Congolese refugees. Recently, we have come to know and befriend a Congolese asylum-seeking family, helped connect them to pro bono legal representation, and supported them through their ordeal which is now into its third year without adjudication. Moreover, the male head of the household was recently paroled after 21 months in detention and is currently awaiting work authorization. Every day that he does not have work authorization is another day of struggle for him and his family -- he and they want nothing more than to work and be contributing members of American society, but our legal and political system is failing them. This proposed rule will greatly degrade asylum-seeking families' ability to be contributing members of society and I strongly oppose it.

AR001657



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 01, 2019
<b>Tracking No.</b> 1k3-9d2b-qc6u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0109

Comment Submitted by Bruce Cohen

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## Submitter Information

**Name:** Bruce Cohen

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## General Comment

Please reconsider this rule change as it presents a lose-lose proposition to all involved. In addition to losing the productive capacity of these workers, we draw away resources from other needs and economic contributions to support able-bodied individuals who want to work. A core value of the US is the dignity of work, and this ruling flies in the face of that ethic.

AR001658

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d2f-3nm3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0110

Comment Submitted by Yuri Davis

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## Submitter Information

**Name:** Yuri Davis

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## General Comment

There needs to be a deep discussion about this topic as pivotal as it is.

AR001659

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 01, 2019
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<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d2e-2k7z
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0111

Comment Submitted by Sarah Baranik

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## Submitter Information

**Name:** Sarah Baranik

**Address:**

1030 E Lancaster Avenue  
Bryn Mawr, PA, 19010

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## General Comment

I am an individual who works with many people who depend on getting a work authorization to support their families while they are waiting for their claims to be adjudicated.

Delays in asylum seekers getting their work authorization (Employment Authorization Document or "EAD") approval can lead to many challenges, including lost income to the asylum seeker and their family and food insecurity. This leaves asylum seekers vulnerable to exploitation, trafficking, and underground economy risks. Asylum seekers should be able to support themselves and their families and contribute to the US economy and tax base while they are waiting to apply for asylum.

AR001660

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 01, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d2e-rrzw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0112

Comment Submitted by Christie Dahlin

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## Submitter Information

**Name:** Christie Dahlin

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## General Comment

Asylum seekers are people fleeing from a violent situation. They are people who need a place of welcome, who come here to be safe. As a Christian I believe that we are called to care for our fellow humanity, and that includes all people regardless of the country they are coming from. Delays in asylum seekers getting their work authorization (Employment Authorization Document or "EAD") approval can lead to:

Lost income to the asylum seeker and their family

Food insecurity

Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID.

Risk of homelessness/housing insecurity

Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify)

Vulnerability to exploitation, trafficking, and underground economy risks

Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income)

Loss of ability to support themselves and their families

Feelings of fear, desperation, and overall mental health concerns

AR001661

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d2e-3vx9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0113

Comment Submitted by Mary McCabe

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## Submitter Information

**Name:** Mary McCabe

**Address:**

110 Harvard Ave.

Swarthmore, PA, 19081

**Email:** mmccabe@hiaspa.org

**Phone:** 2158320914

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## General Comment

Please do not eliminate the 30 day deadline for adjudicating I765s for asylum seekers. I have worked with many asylum seekers and asylees. EADs are so essential to their abilities to care for themselves and their children during the process of seeking protection. The vast majority of these folks want to follow our rules and laws, and do not want to work illegally. We should make it possible for them to have food, shelter, and clothing through their own hard work, and also, at the same time, respect our laws. The only way for them to follow the law and also stay alive is to have an EAD. In particular, these folks' children are so vulnerable, and an EAD will mean a way for them to eat enough food and stay warm and dry.

Also, USCIS even admits that lost compensation to asylum applicants will amount to hundreds of millions of dollars in taxable income per year! Please reconsider this proposal, which would harm our country and people seeking refuge here.

AR001662

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 01, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d2e-1mzd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0114

Mass Mail Campaign 10: Comment Submitted by Anna Ferris (Total as of 11/13/2019: 11)

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## Submitter Information

**Name:** Anna Ferris

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## General Comment

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR001663

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 01, 2019
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<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d2f-24a4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0115

Comment Submitted by Juan Camilo Mendez Guzman

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## Submitter Information

**Name:** Juan Camilo Mendez Guzman

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## General Comment

Eliminating the 30 day requirement is a terrible idea.

Ensuring that asylum seekers can secure lawful employment as soon as possible is in the economic interest of the United States. According to the Department of Health and Human Services, refugees and their family members contributed more than \$343 billion in revenue to federal, state and local coffers. On balance, refugees contributed \$63 billion more than they received in benefits from various programs. The U.S. economy benefits greatly from this population that works so hard when given a chance and permission to work. According to the Brookings Institute, refugees and asylum seekers engage in entrepreneurship at much higher rates than U.S. born individuals. In the U.S., for example, while immigrants are 15 percent of the population, they represent 25 percent of entrepreneurs. Small businesses and the jobs they create are the engines of growth, innovation, and economic stability of the United States.

AR001664



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 01, 2019
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<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d2f-jgoq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0116

Comment Submitted by Sarah Smith

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## Submitter Information

**Name:** Sarah Smith

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## General Comment

Please do not eliminate the 30 day processing period for asylum applicants employment authorization applications. This will not only hurt the individuals and families who are hoping to make their home and invest in our communities and support their families, but will hurt our communities if these individuals are not able to contribute in a meaningful way. Asylum seekers already have a waiting period before they can apply for work authorization, please do not make them wait even longer before authorization is granted. I do not see any benefits from removing the 30 day processing provision. Thank you.

AR001665

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d2g-dz1t
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0117

Comment Submitted by Maya Nojehowicz

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## Submitter Information

**Name:** Maya Nojehowicz

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## General Comment

Please keep the 30 day deadline for USCIS to issue employment authorization documents to asylum seekers. Work permits change the lives of immigrants in this country. Without a work permit people are vulnerable to exploitation, labor trafficking, sex trafficking, and other forms of abuse as they fight for their own survival. A work permit gives an asylum seeker the chance to own their own money, save, contribute to their community, and be part of the legal economy which benefits all of us. We are only strengthened by having more immigrants granted work permits.

AR001666

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d2j-98em
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0118

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

AR001667

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 02, 2019 <b>Status:</b> Posted <b>Posted:</b> November 04, 2019 <b>Tracking No.</b> 1k3-9d31-cc9e <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0119

Comment Submitted by Susan Willis

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## Submitter Information

**Name:** Susan Willis

**Address:**

2115 Roblyn Ave

St Paul, MN, 55104

**Email:** sfwillis143@gmail.com

**Phone:** 651.756.8785

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## General Comment

Respectfully, I am against this provision because it could mean lengthy delays for asylum-seekers to obtain permission to work. Working allows them to provide for themselves and not be a burden on social services. They also contribute towards our economy. I don't understand why you are seeking to change this. The end does not justify the means!

AR001668

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 02, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d37-atv9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0120

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this proposed rule because I believe it will be harmful to American interests and American values.

Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

This proposed rule change appears to a part of this administrations damaging effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin, exemplified by the proposed wide-sweeping public charge rule. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

I also believe there is a better alternative. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

Thank you for your consideration.

AR001669

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 02, 2019
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<b>Tracking No.</b> 1k3-9d3a-oq2m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0121

Comment Submitted by Jane OSullivan

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## Submitter Information

**Name:** Jane OSullivan

**Address:**

5530 40th Ave SW

Olympia, 98512

**Email:** jane@osullivanlawoffice.com

**Phone:** 2063409980

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## General Comment

I opposed removal of the 30 day processing provision. Asylum seekers have fled dangerous situations and are often living an economically precarious existence here in the United States. If eager to work and support themselves, how does taking away a processing provision make any sense? With other categories of EAD processing taking 6 months or more, to take away this provision will lead to great difficulties for vulnerable asylum seekers new to this country and living without any safety net as far as eligibility for food assistance or, in many cases, any family to support them. A removal of the processing provision will lead to greater hunger and homelessness in our cities and be disadvantageous economically. Currently there are not enough low wage workers to fill empty positions in home health care, janitorial services, etc. From my experience as an immigration attorney I know that these are the types of jobs that asylum applicants gravitate towards when first given permission to work.

AR001670

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 03, 2019 <b>Status:</b> Posted <b>Posted:</b> November 04, 2019 <b>Tracking No.</b> 1k3-9d3s-agqp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> API
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0122

Comment Submitted by Jennifer Regier, Executive Board, Student Immigration Law Coalition, University of Denver Sturm College of Law

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## Submitter Information

**Name:** Jennifer Regier

**Address:**

1829 1/2 E Jewell Ave.

Denver, CO, 80210

**Email:** jregier20@law.du.edu

**Phone:** 559-725-5915

**Organization:** Executive Board, Student Immigration Law Coalition, University of Denver Sturm College of Law

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## General Comment

See attached file(s)

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## Attachments

Comment Submitted by Jennifer Regier

AR001671



## **Comment regarding USCIS's Proposal to Change Regulations at 8 CFR Part 208**

This comment is from the executive board of the Student Immigration Law Coalition at University of Denver, Sturm College of Law. We are a group of students dedicated to immigration law and immigrants' rights. We are writing to express our concerns about USCIS's proposed changes to 8 CFR Part 208.

### USCIS's proposal to rescind the 90-day deadline for EAD renewals

We agree with USCIS's proposed rule to eliminate the requirement that an asylum seeker applying to renew his or her Employment Authorization Document (EAD) must submit this application 90 days prior to expiration of the existing EAD.<sup>1</sup> We agree that it is more efficient, more consistent with other regulations, and more fair to applicants to automatically extend an EAD that is filed before it expires.

### USCIS's proposal to rescind its 30-day processing deadline for initial EAD applications for asylum seekers

We disagree with the proposal to eliminate the regulation that imposes a 30-day application processing deadline on USCIS for adjudication of initial EAD applications from asylum seekers. This proposed rule is arbitrary and capricious because (1) there is not a rational connection between the facts USCIS relied on and the choice it made, (2) USCIS relied on inappropriate factors in reaching this decision, and (3) USCIS failed to consider reasonable, obvious alternatives.<sup>2</sup>

- a. USCIS failed to provide rational connections between the facts it relied upon and the choice it made.

Under *State Farm*, USCIS's analysis is flawed because there is not a "rational connection between the facts found and the choice made."<sup>3</sup> USCIS proposes a rescission of the 30-day adjudication deadline for EADs submitted by asylum applicants because the deadline is "outdated" and "does not account for the current volume of applications," leading to an increasing resource burden for USCIS.<sup>4</sup> USCIS conducted an analysis of the impact of removing the deadline by comparing the effects of 30-day adjudication in all cases (i.e. complete compliance with the *Rosario* injunction) to the effects of 30-day adjudication in 47% of cases (i.e. pre-*Rosario* percentages).<sup>5</sup>

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<sup>1</sup> Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, 81 Fed. Reg. 174, 47155 (Sept. 9, 2019) (to be codified at 8 CFR pt. 208).

<sup>2</sup> See *Motor Vehicle Mfrs. Ass'n v. State Farm Mutual Auto. Ins. Co.*, 463 U.S. 29 (1983).

<sup>3</sup> *Id.* at 43 (citing *Burlington Truck Lines v. United States*, 371 U.S. 156, 168 (1962)).

<sup>4</sup> 81 Fed. Reg. 174 at 47153, 47168.

<sup>5</sup> *Id.* at 47150, 47162.

As an initial matter, USCIS is unable to support either its justifications or its impact analysis without citation to recent and actual processing times. Nowhere in the proposed rule does USCIS provide the public with 2018 or 2019 data, which must be available given USCIS’s maintenance of its “Check Case Processing Times” page.<sup>6</sup> In conflict with USCIS’s assertion that “in the absence of this proposed rule the baseline amount of time that USCIS would take to adjudicate would be 30 days,”<sup>7</sup> USCIS—on its own website—estimates that it is currently taking 90 to 150 days to adjudicate EADs based on pending asylum applications.<sup>8</sup> Not only does this mismatch suggest noncompliance with *Rosario*, it also indicates that USCIS is unable to support its justifications for the proposed rule or conduct an accurate impact analysis, as USCIS’s “baseline” does not consider 2018 and 2019 data and is therefore inaccurate.

USCIS’s “resource burden” justification for this rule change suffers from additional fallacies. USCIS claims that the current 30-day deadline (and the resulting court order enforcing its compliance with this deadline) prevents it from pursuing other priorities. USCIS states that eliminating the 30-day requirement would allow it “to operate under long-term, sustainable case processing times for initial EAD applications for pending asylum applicants.”<sup>9</sup> USCIS states that without the 30-day deadline, it would be able to re-allocate its resources to the way they were before the *Rosario* court order.<sup>10</sup> USCIS explains that since the court order, it has focused more resources on adjudicating initial EADs for asylum, but it does not explain how it allocated its resources before, which types of cases it prioritized, and which specific case types are suffering as a result of the court order.

Additionally, USCIS alleges that eliminating the 30-day requirement is necessary in order to “allow sufficient time to address national security and fraud concerns, and to maintain technological advances in document production and identity verification.”<sup>11</sup> This assertion is unsubstantiated, especially because USCIS explains that additional security and anti-fraud measures are already built into the EAD adjudication process.<sup>12</sup> Relatedly, USCIS claims the rule is “outdated” because it was created in 1994, at a time when local offices adjudicated EAD applications and produced the actual EAD cards.<sup>13</sup> Now the entire adjudication process is more complex, the card production process is more sophisticated to deter fraud, and USCIS is receiving more asylum applications than it had in the past.<sup>14</sup> Regardless, though, USCIS fails to recognize other important conditions that have changed since the rule was adopted. USCIS now has much more funding, staff, and technology than it had in 1994, when adjudication duties were handled by INS. In the late 1990s, when INS was the sole immigration agency, it had about 30,000 employees.<sup>15</sup> Currently, ICE, CBP, and USCIS have a combined workforce of almost

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<sup>6</sup> *Check Case Processing Times*, USCIS, <https://egov.uscis.gov/processing-times/home> (last visited Sept. 16, 2019).

<sup>7</sup> 81 Fed. Reg. 174 at 47149.

<sup>8</sup> *Check Case Processing Times*, USCIS, <https://egov.uscis.gov/processing-times/home> (last visited Sept. 16, 2019).

<sup>9</sup> 81 Fed. Reg. 174 at 47150.

<sup>10</sup> *Id.* at 47167.

<sup>11</sup> *Id.* at 47150.

<sup>12</sup> *Id.* at 47154-55.

<sup>13</sup> *Id.* at 47154.

<sup>14</sup> *Id.* at 47153-54.

<sup>15</sup> *Agency History: Late Twentieth Century*, USCIS, <https://www.uscis.gov/history-and-genealogy/our-history/agency-history/late-twentieth-century> (last visited Sept. 16, 2019).

100,000 employees, with about 19,000 at USCIS.<sup>16</sup> Additionally, USCIS's budget in FY 2017 was six times its budget in 2004.<sup>17</sup>

Furthermore, USCIS concedes that it would pursue this rule even if it began receiving fewer asylum applications. USCIS states that “even if it could reliably project a reduction in total application volume, such reduction would not, on its own, serve as a sufficient basis to leave the 30-day adjudication timeline in place.”<sup>18</sup> Thus, USCIS admits that it would have proposed this rule regardless of the additional resource burden, removing resource burden as a standalone justification for the proposed rule.

- b. USCIS failed to consider important aspects of the problem and considered some factors Congress did not intend for it to consider.

In addition to the inaccurate baseline discussed above, USCIS's impact analysis also suffers from numerous oversights. The main impact USCIS considered was the cost employers would incur as a result of being unable to hire asylum seekers who are still waiting to receive their work authorization.<sup>19</sup> However, USCIS failed to consider an important aspect of the problem: the collateral consequences asylum seekers face when they lack EADs.<sup>20</sup> USCIS's analysis is based on the assumption that every asylum seeker applying for an EAD is an adult seeking work authorization in order to enter the workforce. However, many asylum seekers with pending applications for EADs are children, and an EAD serves other important purposes beyond providing work authorization. For many asylum seekers, an EAD is their only form of government-issued ID in the U.S, and for some who lack passports from their home country, it may be their only form of ID from any country. Many aspects of everyday life in the U.S. require an ID, and an individual without one is at a real disadvantage. However, once an asylum seeker obtains an EAD, she can obtain a Social Security number, and in most states, a driver's license. The problems caused by lack of documentation are compounded for asylum seekers who live near the southern border, as they are surrounded by interior immigration checkpoints that severely limit their freedom of movement.<sup>21</sup> Once they have an EAD, though, they can safely pass through these checkpoints to access healthcare and legal services.

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<sup>16</sup> See *About Us*, USCIS, [www.uscis.gov/aboutus](http://www.uscis.gov/aboutus) (last visited Sept. 16, 2019); *Fact Sheet: Immigration and Customs Enforcement*, Nat'l Immigration Forum (July 10, 2018), <https://immigrationforum.org/article/fact-sheet-immigration-and-customs-enforcement-ice/> (stating that ICE has over 20,000 employees); *About CBP*, CBP, [cbp.gov/about](http://cbp.gov/about) (last visited Sept. 16, 2019) (stating that CBP has over 60,000 employees).

<sup>17</sup> DHS, DHS BUDGET IN BRIEF, FISCAL YEAR 2004 17, <https://www.dhs.gov/dhs-budget-brief-fiscal-year-2004>; DHS BUDGET IN BRIEF, FISCAL YEAR 2017 10, [https://www.dhs.gov/sites/default/files/publications/FY2017\\_BIB-MASTER.pdf](https://www.dhs.gov/sites/default/files/publications/FY2017_BIB-MASTER.pdf).

<sup>18</sup> 81 Fed. Reg. 174 at 47161.

<sup>19</sup> *Id.* at 47149–50.

<sup>20</sup> See *State Farm*, 463 U.S. at 43 (An agency rule is arbitrary and capricious if “the agency has relied on factors which Congress has not intended it to consider” or has “entirely failed to consider an important aspect of the problem”).

<sup>21</sup> As one example, for an asylum seeker living in Las Cruces, New Mexico, any trip more than about an hour's drive from Las Cruces involves passing through an interior checkpoint. She cannot travel to Albuquerque, Santa Fe, Tucson, or any major city in Texas other than El Paso without passing through a checkpoint.

USCIS also failed to fully consider the costs of delayed EAD adjudication to an asylum seeker's family members. When the adults in a family of asylum seekers face delays to obtaining work authorization, this puts the entire family in a difficult financial situation, especially since most of these families are ineligible for any public benefits. USCIS considers this issue in a cursory fashion, noting that the change "could decrease disposable income of families" but then quickly concluding that "the benefits of the action justify the potential financial impact on the family."<sup>22</sup> USCIS assumes that most asylum seekers have disposable income, when in fact, most are struggling to provide for their basic needs. However, in a different section of the notice of proposed rulemaking, USCIS acknowledges that many asylum seekers face financial difficulties, alluding to the support networks asylum seekers may rely on.<sup>23</sup> Regardless, USCIS still makes the conclusory statement that its own unspecified workload priorities outweigh these financial strains on asylum seekers and their families.

In sum, the cost estimates USCIS has provided for this proposed regulation are incomplete and thus are far understated. In attempting to balance these understated costs against the benefits to USCIS to determine the impact of the regulation, USCIS alludes only to "reduced opportunity costs to the federal government," which USCIS admittedly did not bother to estimate.<sup>24</sup> USCIS lists the benefits of the proposed rule as: reduced adjudication time for *other* applications, needing fewer employees, having more time to address security and fraud concerns, providing up-to-date processing time information for applicants, and no longer having to deal with litigation.<sup>25</sup> Not only can USCIS not effectively judge the impacts of this proposed rule without estimating reduced opportunity costs to the federal government, we can assume that the financial costs to individuals, businesses, and the federal government in the form of lost taxes far outweigh the financial benefits to USCIS. While harder to quantify, it is also likely that the intangible benefits of this rule—primarily security and fraud concerns—are far overshadowed by the many costs to applicants and their families.

It is also highly inappropriate for USCIS to include the end of litigation as a benefit.<sup>26</sup> USCIS's unwillingness to comply with ongoing litigation has nothing to do with "efficiently and fairly" administering the immigration system and goes against USCIS's commitment to protect the system's integrity.<sup>27</sup> Even more importantly, USCIS has a duty to comply with its own regulations and must base any decision to retract regulation on factors that "Congress [] intended it to consider."<sup>28</sup> Noncompliance and resulting litigation cannot be factors Congress would have intended USCIS to consider in its analysis; otherwise, agencies would be justified in retracting regulations any time they fell out of compliance.

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<sup>22</sup> 81 Fed. Reg. 174 at 47169.

<sup>23</sup> *Id.* at 47165.

<sup>24</sup> *Id.* at 47165 ("USCIS has not estimated these avoided costs.").

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

<sup>27</sup> See *About Us*, USCIS, <https://www.uscis.gov/aboutus> (last visited Sept. 16, 2019).

<sup>28</sup> See *State Farm*, 463 U.S. at 43.

- c. USCIS failed to consider reasonable, obvious alternatives to rescinding the regulation.

Another flaw in USCIS's reasoning is its failure to consider reasonable alternatives. An obvious alternative to rescinding the 30-day adjudication requirement is hiring additional staff. USCIS considered this alternative in only a few sentences, stating that hiring staff "would not immediately and in all cases shorten adjudication timeframes because (1) additional time would be required to onboard and train new employees, and (2) for certain applications, additional time is needed to fully vet an applicant, regardless of staffing levels."<sup>29</sup> The time needed to train staff would not be a long-term issue, and the addition of staff to the Background Check Unit and the Center Fraud Detection Office would likely reduce time needed to process even those applications selected for additional processing. USCIS does not provide any information to the contrary. Finally, USCIS admits that it failed to even estimate the cost of hiring additional staff.<sup>30</sup> Without such basic data, USCIS could not have reasonably considered this alternative. Such cursory analysis does not constitute consideration of this inherently obvious and reasonable alternative.

USCIS briefly considered changing the requirement to require adjudication within 90 days rather than 30 days.<sup>31</sup> However, the notice of proposed rulemaking provides only cursory analysis of this alternative, concluding that it "would not provide USCIS with the certainty and flexibility it needs to fulfill its core mission" and "would unnecessarily place operational constraints on adjudicators."<sup>32</sup> USCIS does not elaborate on these statements. It is not clear which aspect of USCIS's core mission would suffer, nor is it clear why the constraint on adjudicators would be unnecessary.

Additionally, USCIS completely failed to consider the obvious alternative of imposing a 60-day processing deadline. Since USCIS indicated that in FY 2017, following the court order, it was able to adjudicate 78% of EAD applications within 60 days, this seems like an obvious alternative the agency should have considered.<sup>33</sup> In fact, given USCIS adjudication rates in FY 2017, it would have been more logical for USCIS to consider the 60-day deadline before considering the 90-day deadline. However, USCIS completely disregarded this alternative.

In sum, for all of these reasons, the proposed regulation regarding the 30-day processing deadline for EADs would not stand up to an arbitrary and capricious review in court and thus should not be adopted.

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<sup>29</sup> 81 Fed. Reg. 174 at 47156.

<sup>30</sup> *Id.* at 47149.

<sup>31</sup> *Id.* at 47166–67.

<sup>32</sup> *Id.* at 47167.

<sup>33</sup> Granted, USCIS processing times have increased greatly since FY 2017, according to its own website, but USCIS did not consider data from FY 2018 or 2019 in this notice of proposed rulemaking.

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0123

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Dear Madam or Sir,

I oppose the regulation change. Our faith based community has worked with an asylum seeker from one of the Northern Triangle countries. Jenaro (not his real name) is a college graduate whose English is terrific, has a 2023 hearing scheduled, has completed many training programs in his field, and has had to turn down many job offers because of his immigration status which won't allow him to work 'til the end of this calendar year. Jenaro meets every standard for being an outstanding American citizen. If this rule change is made he could be left waiting indefinitely. We have know and worked with Jenaro for close to a year now and he should be allowed to proceed as a valuable working member of our community.

AR001677



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0124

Comment Submitted by Sally Sutton, New Mainers Resource Center, Portland Adult Education

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## Submitter Information

**Name:** Sally Sutton

**Submitter's Representative:** Sally Sutton

**Organization:** New Mainers Resource Center, Portland Adult Education

**Government Agency Type:** Local

**Government Agency:** New Mainers Resource Center, Portland Adult Education

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## General Comment

I am writing to oppose the proposed rule change to remove the 30 day processing time requirement for asylum applications for work authorization (EADs). I am the coordinator of a program within an adult education program working with many asylum seekers. My experience has been that people are very anxious to begin working and generally are able to find jobs as soon as they get their work authorization. Living in Maine, a state that has a workforce shortage, this proposed rule change not only delays the asylum seeker from entering the workforce, supporting themselves and their families, contributing to the economy and paying taxes, it also hurts employers. Maine employers are dealing with a shortage of workers. One example points this out very clearly. Recently a very popular bakery in my neighborhood had to close half of their business because they could not find enough workers.

This proposed rule change is not based on any cost benefit analysis - looking at the cost of processing applications in a timely fashion versus the lost wages and reduced production and taxes paid by many businesses against the cost of processing applications in a timely way so that people could work as soon as possible.

This proposed rule also does not take into consideration an alternative approach that would not only allow more time to process applications but also get it done in a way that is more efficient and will allow people to be working earlier. Asylum seekers should be allowed to submit their EAD at the time of their asylum application. This will allow extra time for processing that should still fall within the allotted time frame and also be more efficient because the initial asylum application and the EAD can be processed together. Taking this approach makes the most sense - it is efficient, it will get the asylum seeker working sooner, which is what they want to do, and it will help to address the country's workforce shortage and meet employers needs for workers.

AR001678



Thank you for considering my comments.

AR001679

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0125

Comment Submitted by Esther Lumm

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## Submitter Information

**Name:** Esther Lumm

**Address:**

AZ, 85042

**Email:** Lumm2@cox.net

**Phone:** 602 595-6838

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## General Comment

I am opposed to any rule that delays the asylum seekers from being able to obtain a work permit. The US government , i.e. the Trump administration currently complains that asylum seekers are a burden to the US economy. Yet they do everything to block them from being independent. They place delays on the time in which they can get a work permit, and then criticize them for not working. They attempt to place even more burdens by saying that they have to have health insurance, yet they know well that they cannot get health insurance without a job! Stop these harmful proposals that are merely designed to contradict the US constitution, which clearly states the rights of an asylum seeker!

AR001680

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0126

Comment Submitted by Elise Goss- Alexander

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## Submitter Information

**Name:** Elise Goss-Alexander

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## General Comment

I am a career development professional who previously worked in human rights and continues to volunteer with immigrant and asylum seeker populations in the DC area. I have worked both professionally and as a volunteer with asylum seekers before and after they have been granted work authorization and I am very concerned about the impact of this proposed rule.

This proposed rule would increase the already-strong negative impacts on asylum seekers' mental and physical health of the lengthy and complex process, which are exacerbated by the uncertainty and financial insecurity of delays in processing work permits. I have worked with asylum seekers on their career development, individuals ranging from internationally-recognized human rights activists to former small business owners to highly education students and academics. In every single one of these cases, the asylum seeker, who already faces the stresses of displacement and sometimes harassment by powers in their home country, experiences some degree of mental health concerns and financial and health insecurity due to delays in work permits. Someone who flees persecution in their home country often arrives in the U.S. with little but they are nearly always ready and willing to work and contribute to the American economy, society, and (in the case of activists and academics working on issues of human security and human rights) national security. When work permits are delayed beyond the legal limit, we as a country lose out on their contributions and their ability to make these contributions in future is lessened as their period of unemployment extends. Finally, in the case of asylum seekers who are less financially and socially secure than those with whom I usually work, they experience increased vulnerability to forced labor and exploitation the longer legal work remains out of reach.

I would suggest that not only should this rule not be implemented, but additionally, that the 30-day processing guidance enforcement mechanism should be strengthened. Asylum seekers' lives are not political toys, and neither are our U.S. economy, society, and security.

AR001681

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0127

Comment Submitted by Robert Pauw

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## Submitter Information

**Name:** Robert Pauw

**Address:**

1000 Second Ave., Suite 1600

Seattle, WA, 98104

**Email:** rpauw@ghp-law.net

**Phone:** 206-682-1080

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## General Comment

I am writing in opposition to the proposed regulation to remove the 30-day processing requirement for work authorization for asylum applicants. USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

USCIS makes frequent reference to a rise in national security threats as a reason to spend more time and resources on each decision. However, USCIS has reported that it has been able to decide over 99% of EADs within the 30-day timeframe for over the past year. Therefore, USCIS has proven its ability to adequately vet the amount of requests in a timely fashion. Moreover, its argument regarding increased threats serves only to prompt the need for a speedier process to properly protect national security, rather than its request to delay the process further. This need for a speedier process is further compounded by the fact that the EAD applicants are asylum-seekers already residing in the United States. If vetting must be done to prevent security risks, then having unvetted people in the U.S. subjected to a potentially indefinite review period is contrary to the departments stated interests.

AR001682

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0128

Comment Submitted by Robin Nice

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## Submitter Information

**Name:** Robin Nice

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## General Comment

Removing this requirement would cause extreme hardship to a population that has already experienced or fears experiencing severe hardship and trauma. Asylum applicants are already required to arbitrarily wait 150 days before they can apply for work permits because of the deluded assumption that all asylum cases should be adjudicated within 180 days -when reality they often take 3+ years. To make these individuals wait even longer before they can lawfully work puts them at greater risk of exploitation and makes it that much harder for them to afford legal counsel, which is often critical to winning asylum cases.

AR001683

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0129

Comment Submitted by Georgia Morgan

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## Submitter Information

**Name:** GEORGIA MORGAN

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## General Comment

I'm sorry to say it, but this rule is wrong-headed. Government agencies should be acting as swiftly as possible to rule on applications, as it benefits not only the asylum seekers (who must rely on charity while they are waiting for permission to work), but also potential employers, who are eager for willing workers. Surely the intent is not to needlessly make the lives of asylum seekers miserable, but that is the effect.

AR001684

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0130

Comment Submitted by Ali Noorani, National Immigration Forum

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## Submitter Information

**Name:** Ali Noorani

**Submitter's Representative:** Daniel Kosten

**Organization:** National Immigration Forum

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## General Comment

The National Immigration Forum is submitting this comment on the proposed rule: Removal of 30-Day Processing Provisions for Asylum Applicant-Related Form I-765 Employment Authorization Applications.

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## Attachments

National Immigration Forum

AR001685



November 4, 2019

Ms. Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW, #2140  
Washington, DC 20529-2140

**Re: Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications (DHS Docket No. USCIS-2018-0001)**

Dear Ms. Deshommes:

On behalf of the National Immigration Forum (Forum), I respectfully submit the following comments on the proposed rule titled *Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications* (DHS Docket No. USCIS-2018-0001), published in the Federal Register by the Department of Homeland Security (DHS) on September 9, 2019.

Founded in 1982, the Forum advocates for the value of immigrants and immigration to the nation. We play a leading role in the national debate about immigration, knitting together innovative alliances across diverse faith, law enforcement, veterans and business constituencies in communities across the country.

DHS should rescind the proposed rule because of the economic harm the proposed change will have on asylum seekers, businesses, federal, state, local governments, and the general population, and because DHS has not adequately explained how the costs of this rule outweigh the benefits.

Current regulations provide asylum seekers with work authorization only when their case is won or after 180 days of having submitted a complete asylum application (30 days after they are eligible to file for work authorization). The proposed rule would delay even further the opportunity to work legally and would have unnecessary negative consequences on asylum seekers, businesses, and our communities. Asylum seekers will be harmed in terms of lost wages. USCIS estimated that because of this change asylum seekers could see a cumulative wage loss of as high as 774.76 million dollars annually.

The delay in work authorization will have a detrimental impact on asylum applicants' dignity and overall well-being. Numerous studies have linked an individual's well-being with their ability to secure and maintain employment. The loss of, or inability to, work can result in declining living standards, income insecurities, the loss of self-esteem, and shrinking social contacts and networks. This proposed rule would undermine the dignity of work.

This proposed rule will negatively affect asylum seekers ability to obtain other important documents and services that often depend on having employment, including driver's licenses, healthcare, banking and credit services. It will also place an addition cost on, and stretch the resources of, non-profit organizations and charities that provide asylum seekers with services and support in the area of housing, financial and legal consultation, health and other services.

This rule will give asylum seekers no opportunity to work, while waiting for their asylum case to be decided, except to work without authorization in order to support themselves and their family. Work without authorization, however, exposes the asylum seeker to being hired by unscrupulous employers who could violate other laws resulting in their exploitation in terms of unfair wages, unpaid overtime, not being paid at all, and hurting American workers as well.

This proposed rule would negatively affect businesses. Businesses are already hard pressed to find the workers they need to fill millions of vacant jobs. Currently approximately 7.2 million job openings exist. This proposed rule would further shrink the pool of available workers. For businesses, it is essential that asylum seekers be granted work authorization as soon as possible.

Federal, state and local governments would be harmed in terms of the annual loss of tax revenue on the estimated 774.76 million dollars in lost wages. On average 14 percent of individual wages are paid in taxes, and those taxes are used to support critical services such as Social Security, Medicare, and various state and local programs. Not only will individual taxes be lost, but also corporate contributions toward Social Security and Medicare. DHS estimates that this change could result in losses to Medicare and Social Security as high as 118.54 million dollars annually.

The general population will also be negatively impacted given the loss of tax revenue to federal and state programs that benefit the public. Not being able to work would represent a loss of spending power by asylum seekers who would otherwise contribute to the overall economy in terms of their purchases. In its estimated costs, DHS has not included losses to businesses employing, doing business, and providing services to asylum seekers.

Given the potential wage loss of up to 775 million dollars annually, the loss to Medicare and Social Security of up to 118,54 million dollars annually, and the other economic harm outlined above, a cost-benefit analysis should be conducted before this proposed rule is finalized. Given the already known and significant cost of the change, it would seem abundantly clear that the cost far outweighs any benefit in this proposed rule. A full cost-benefit analysis is in order.

Changing the 30-day deadline for USCIS to make an employment authorization decision removes any incentive by USCIS to prioritize a decision on work authorization for asylum seekers. In effect, this proposed rule moves the decision from one with a hard deadline and therefore, one of high priority, to one without any deadline and a last, if not lost, priority.

A majority of Americans (two-thirds) are [united](#) in believing that people who qualify for asylum should be allowed to come to the U.S. Eroding asylum through this proposed rule, erodes fundamental national values. This rule contravenes Congress' intention to protect migrants with well-founded fears of persecution and to help in their integration into U.S. society and the workforce as quickly as possible.

For the reasons stated above, the National Immigration Forum believes DHS should rescind the proposed rule titled *Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications*. Alternately, DHS should consider changing deadlines for employment authorization and not simply remove the deadline altogether. DHS has not sufficiently justified why an indefinite deadline is better than an alternative or longer deadline.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'Ali Noorani', with a long horizontal line extending to the right.

Ali Noorani  
Executive Director  
National Immigration Forum

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0131

Comment Submitted by Sherri Masson

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## Submitter Information

**Name:** Sherri Masson

**Address:**

760 Milford Glen Dr.  
Milford, 48381

**Email:** shercs@mac.com

**Phone:** 2486131840

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## General Comment

All efforts should be made to shorten this process, not lengthen it.

AR001689

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0132

Comment Submitted by Aubrey Hill

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## Submitter Information

**Name:** Aubrey Hill

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## General Comment

This rule change seems to transparently be a way of indefinitely denying asylees the right and ability to work and support themselves. I see no way in which this rule change would be beneficial to the nation or to asylum seekers. Denying people access to social services increases the incidence of other major traumatizing factors the we will have to pay for as a society sooner or later. Things like homelessness and health deterioration are way more expensive to deal with after they have happened. So let's continue (slash improve at?) providing access to services to asylum seekers in a timely fashion. Lastly there's just the argument that it's morally wrong to not help these people and to hold them hostage to our broken politicized immigration processes.

AR001690

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0133

Comment Submitted by Danielle Rosche

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## Submitter Information

**Name:** Danielle Rosche

**Address:**

655 S. Orcas St.

#206

Seattle, WA, 98144

**Email:** daniellerosche@gmail.com

**Phone:** 2064987160

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## General Comment

I am an immigration attorney representing asylum seekers in front of USCIS and EOIR. Because of backlogs these cases regularly take years to be adjudicated to no fault of the immigrants. Oftentimes even getting the first interview can take 5 years and even after that time USCIS sometimes states that background checks are not completed. It is extremely stressful for my clients to be in the US without permanent status and delaying their work authorization cards would contribute to even more of a stressful situation for them. Without work authorization asylum seekers often have no valid ID, as they cannot obtain passports from their home countries, and most states will not issue drivers licenses without a social security number. Removing the timeframe for adjudication of EAD will hurt these immigrants, national security, and is not the most effective way of achieving the government's stated goals.

In my practice one, of the things that I focus on is obtaining a work authorization document for my clients. Having a work authorization allows asylum seekers to support themselves and their family, provides a much needed sense of stability and independence, allows them to obtain health insurance, and root themselves in a new community after whatever particular traumatic upheaval led them to leave their home country.

Removing the required timeline for USCIS to process EAD applications will result in lengthy delays. If the government's goal is to enhance national security by screening asylum seekers through the EAD process an indefinite delay of this process is nonsensical. The government should be focused on screening these applicants as quickly as possible, not removing timelines for screening.

AR001691

Asylum seekers must already wait six months after filing their I-589 applications to obtain work authorization. If the true goal of the rule is to allow USCIS to have more time to adjudicate and run background checks on EAD applicants than that goal would be accomplished better by removing the requirement that asylum applicants can only file their cases 30 days before they meet the 6 month deadline. Instead, allowing applicants to file for an EAD 60 days early would give the agency 60 days to screen the applicants without delaying the asylum applicants EAD beyond the 6 months period.

AR001692



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 04, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d4i-ctzk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0134

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This is a bad rule for asylum seekers and the United States. This rule will move the country backwards financially and likely increase the already burdened immigration courts. USCIS is notorious for inexplicably lengthy processing times for all applications and petitions and without the thirty-day measure holding them accountable, the deadline will likely be extended many times what it already is currently. This leaves individuals who have come to the United States for protection from harm in a place of financial duress and vulnerability.

AR001693

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 04, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 04, 2019
<b>Tracking No.</b> 1k3-9d4j-ftig
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0135

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I work for a social services organization where we serve numerous Asylum seekers each year. I find the proposed rule change to be cruel and unnecessary. By promoting these types of policy changes, we are not only placing these individuals at a higher risk of being taken advantage of but also losing out on tax revenue and economic benefits that come from employed individuals with spending power.

AR001694

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-ammo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0136

Comment Submitted by Cheryl Behrent

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## Submitter Information

**Name:** Cheryl Behrent

**Address:**

6686 Elm St

PO Box 926

North Branch, MN, 55056

**Email:** paixbehr@gmail.com

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## General Comment

Removing the requirement to adjudicate within 30 days for work permit applications would be a significant blow to asylum seekers and would impact non-profit service providers who already struggle to provide adequate support while an asylum seeker waits to be able to work. It is counter-intuitive to further slow the process of work eligibility for persons who want to work in labor intensive jobs in entry level positions and they want to pay taxes. Further slowing work eligibility means further slowing tax collection from these individuals.

AR001695

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-ure3 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0137

Comment Submitted by Pamala Haupt

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## Submitter Information

**Name:** Pamala Haupt

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## General Comment

Fix the immigration laws. Protect Americans.

AR001696

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-72em <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0138

Comment Submitted by Robert Doan

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## Submitter Information

**Name:** Robert Doan

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## General Comment

Get to Work !!!

AR001697

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-19fe
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0139

Comment Submitted by Kathleen Goritski

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## Submitter Information

**Name:** Kathleen Goritski

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## General Comment

You lock your doors. You lock your car. Why would we let anyone in without checking who they are. Why would we not deport illegals who have committed crimes? Every politician took an oath to PROTECT AND UPHOLD OUR LAWS. The American citizens should come 1st. People who have done things the right way to come to this country deserve better.

Power and GREED will get all of those taking the oath should heed and listen to the people you made promises to.

AR001698

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-ufpo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0140

Comment Submitted by Barbara Bucklin

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## Submitter Information

**Name:** Barbara Bucklin

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## General Comment

I agree with the policies of President Trump and his immigration reforms. Time to press in for the safety and sanity of this nation.

AR001699



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-ccrn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0141

Comment Submitted by Francis Vivlamore

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## Submitter Information

**Name:** Francis Vivlamore

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## General Comment

Immigration laws need to be changed. Support President Trumps immigration reforms and stop supporting law breaking immigrants , and that's what they are when they cross our borders illegally!

AR001700

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-2eue
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0142

Mass Mail Campaign 7: Comment Submitted by Ferdeliza Palma (Total as of 11/13/2019: 14)

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## Submitter Information

**Name:** Ferdeliza Palma

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## General Comment

I support Pres. Trump's immigration reforms.

AR001701

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-5ds4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0143

Comment Submitted by Charlene Knop

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## Submitter Information

**Name:** Charlene Knop

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## General Comment

The immigration reforms have been requested by most Americans who are able to think on their own. We will remember who did not vote for them.

AR001702

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-g4y1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0144

Comment Submitted by Cynthia Papia

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## Submitter Information

**Name:** Cynthia Papia

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## General Comment

About time DC starts allowing immigration properly to be done, both for and against.

AR001703

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-n2p9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0145

Comment Submitted by Tom Hutchison

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## Submitter Information

**Name:** Tom Hutchison

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## General Comment

Increase the staffing and lengthen the time to vet each person wanting to enter the USA. 30 days is not enough to do the job properly. Support President Trump on immigration reform.

AR001704

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-6oik <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0146

Comment Submitted by Robert Mahaffey

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## Submitter Information

**Name:** Robert Mahaffey

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## General Comment

Support President Donald Trumps immigration reform policy and help secure Americans.

AR001705

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-6bbn <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0147

Comment Submitted by Alex Ayotte

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## Submitter Information

**Name:** Alex Ayotte

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## General Comment

Imigration is an example of the people's business not being done because continuing witch hunt. Stop the Democratic there acting illegally and wasting time.

AR001706



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-9mbw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0148

Comment Submitted by Lloyd Anselme

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## Submitter Information

**Name:** Lloyd Anselme

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## General Comment

support President Trump on Immigration

Reforms. Get off of your high horse trying to find fault with President Trump and get on the job you are getting paid to do.

AR001707

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-yium <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0149

Comment Submitted by David Marion

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## Submitter Information

**Name:** David Marion

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## General Comment

Please support the presidents immigration reforms.

AR001708

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-gvtz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0150

Comment Submitted by Kathryn Winson

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## Submitter Information

**Name:** Kathryn Winson

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## General Comment

Please support President Donald J. Trumps Immigration Reforms!!!  
Thank you.

AR001709

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-5cum
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0151

Comment Submitted by Richard Curry

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## Submitter Information

**Name:** Richard Curry

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## General Comment

I 100%Support President Trumps Immigration reform bill. It's the right things to do, why should those who break our laws be allowed to cut ahead of the line.when they break our laws?

AR001710

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-lpmm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0152

Comment Submitted by Peggy butz

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## Submitter Information

**Name:** Peggy butz

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## General Comment

Stop the illegals coming in..They get better stuff then American's..They get brand new white car and monies to buy prime land..i never got nothing like that for being poor...im pushed .BECAUSE THE DAM DEMOCRATES AND LIBERALS ARE GIVING MEXICO CALIFORNIA. FACT.

AR001711

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-cgvs
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0153

Comment Submitted by Margaret Dumas

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## Submitter Information

**Name:** Margaret Dumas

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## General Comment

Our current system punishes people for coming here LEGALLY and it weakens our national security. This has to change and it must change NOW!

Thats why Im asking you to help President Trump and Ken Cuccinelli remove these ridiculous restrictions and secure Americas safety.

AR001712

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-vsah <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0154

Mass Mail Campaign 6: Comment Submitted by L Slavicek (Total as of 11/7/2019: 6)

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## Submitter Information

**Name:** L Slavicek

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## General Comment

By law, the Trump Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

This forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are playing by the rules. Thats INSANE!

AR001713



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-cb0m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0155

Comment Submitted by Erasmo Ayala

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## Submitter Information

**Name:** Erasmo Ayala

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## General Comment

bureaucrats are cutting corners on background checks and are diverting valuable resources away from LEGAL immigrants who are playing by the rules. Thats INSANE!

Why the Left is supporting a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline is beyond me.

This has to change and it must change NOW!

Please help President Trump and Ken Cuccinelli remove these ridiculous restrictions and secure Americas safety.

AR001714

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-dhyf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0156

Comment Submitted by Kathryne Ahmed

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## Submitter Information

**Name:** Kathryne Ahmed

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## General Comment

Please support President Trump I do!!!

AR001715

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-wtan <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0157

Comment Submitted by Susan Kendrick

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## Submitter Information

**Name:** Susan Kendrick

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## General Comment

Please make sure each immigrant coming into our country comes through proper channels and does not get ahead of the immigrants that have been here for years waiting their turn.  
Democrats are trying to destroy America. We do not want Socialism in America.

AR001716

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-vx3z
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0158

Comment Submitted by Raffaele Cafagna

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## Submitter Information

**Name:** Raffaele Cafagna

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## General Comment

It is " Mandatory " to properly screen each and every single asylum seeker that comes to our country and applies for a work permit. Mandatory background checks have to be done so to know " Everything " about refugees . Do not cut corners and later be sorry . Do not allow criminals to come here to destroy Americans .

This forces bureaucrats to cut corners on background checks and

AR001717

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-vzi6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0159

Comment Submitted by Chester Rusinek

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## Submitter Information

**Name:** Chester Rusinek

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## General Comment

We must support President Trump's immigration reform.

AR001718

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-6wv6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0160

Comment Submitted by Shawn Dockter

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## Submitter Information

**Name:** Shawn Dockter

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## General Comment

Please support Donald Trump on his imigration process.

AR001719

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-rwzo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0161

Comment Submitted by David Brammann

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## Submitter Information

**Name:** David Brammann

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## General Comment

We need to support the Presidents immigration reforms. The Democrats solution is unacceptable!

AR001720

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0162

Comment Submitted by Russ Sutton

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## Submitter Information

**Name:** Russ Sutton

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## General Comment

Please support the common sense reforms proposed by the White House.

Thank you,  
Russ Sutton

AR001721



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0163

Comment Submitted by Leslie Portugal

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## Submitter Information

**Name:** Leslie Portugal

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## General Comment

By law, the President Trump's Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

This law forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are entering America the lawful way.

Please do not support a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline.

This has to change and it must change now!

Thats why Im asking you to help President Trump and Ken Cuccinelli remove these ridiculous restrictions and secure Americas safety.

AR001722

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-pbbc <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0164

Comment Submitted by Charles Still

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## Submitter Information

**Name:** Charles Still

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## General Comment

We need immigration reform now! Help the President implement this.

AR001723

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0165

Comment Submitted by Donald Lynch

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## Submitter Information

**Name:** Donald Lynch

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## General Comment

Those who crash our borders seeking citizenship must receive full investigation! Funds designated for legal immigrants must not be diverted to other uses.

AR001724

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0166

Comment Submitted by Robert Gilmore

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## Submitter Information

**Name:** Robert Gilmore

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## General Comment

President Trump need your support on his imagination laws and building the wall the protect our legal citizens.

AR001725

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0167

Comment Submitted by Ira Livit

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## Submitter Information

**Name:** ira livit

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## General Comment

please do what yoy have to

AR001726

# PUBLIC SUBMISSION

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<b>Received:</b> November 05, 2019
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0168

Comment Submitted by Jill Marie Bussey on behalf of the Catholic Legal Immigration Network, Inc. (CLINIC)

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## Submitter Information

**Name:** Jill Marie Bussey

**Address:**

8757 Georgia Avenue

Suite 850

Silver Spring, MD, 20910

**Email:** jbussey@cliniclegal.org

**Phone:** 3015654833

**Organization:** Catholic Legal Immigration Network, Inc. (CLINIC)

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## General Comment

On behalf of the Catholic Legal Immigration Network, Inc. (CLINIC) we submit these comments in response and opposition to the Department of Homeland Security's Notice of Proposed Rulemaking (NPRM) entitled Removal of 30-day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications published on September 9, 2019. CLINIC calls on DHS to withdraw this NPRM. Please see our full comments attached.

See attached file(s)

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## Attachments

Catholic Legal Immigration Network, Inc

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*Submitted via <http://www.regulations.gov>*

November 5, 2019

Samantha Deshommes, Chief  
Regulatory Coordination Division  
Office of Policy and Strategy,  
US. Citizenship and Immigration Services,  
Department of Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, D.C. 20529

**RE: DHS Docket No. USCIS-2018-0001, RIN 1615-AC19  
Removal of 30-Day Processing Provision for Asylum Seekers' Initial  
Employment Authorization Document Applications**

Dear Chief Deshommes:

The Catholic Legal Immigration Network, Inc. (CLINIC) submits these comments in response to the Department of Homeland Security's (DHS) Notice of Proposed Rulemaking (NPRM) entitled "Removal of 30-day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications" published on September 9, 2019.

CLINIC embraces the core Gospel value of welcoming the stranger. CLINIC promotes the dignity and protects the rights of immigrants in partnership with a dedicated network of Catholic and community legal immigration programs. CLINIC is the largest nationwide network of nonprofit immigration programs, with approximately 375 affiliates in 49 states and the District of Columbia. Through its affiliates, CLINIC advocates for the just and humane treatment of asylum seekers through direct representation, pro bono referrals, and engagement with policy makers.

There is no justifiable reason to implement a rule change that would increase economic hardships for asylum seekers and their families, the employers they work for, and the communities in which they live. Therefore, DHS should withdraw the NPRM "Removal of 30-day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications."

CLINIC appreciates the opportunity to provide comments on this proposed rule. CLINIC believes that U.S. policies on immigration should reflect the country's core moral values and historical practice of welcoming immigrants and refugees fleeing persecution. Immigration policies should ensure justice, offer protection, and treat immigrants humanely. People of faith have consistently

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stood by the principle that all immigrants, especially the most vulnerable among us, including asylum seekers, deserve an immigration system that is fair and humane.

As Pope Francis has said, “I ask leaders and legislators and the entire international community to confront the reality of those who have been displaced by force, with effective projects and new approaches in order to protect their dignity, to improve the quality of their life and to face the challenges that are emerging from modern forms of persecution, oppression and slavery.”<sup>1</sup>

CLINIC likewise believes that the most vulnerable among us need greater protections and opportunities, including the ability to work to support themselves and their families. In this vein, CLINIC submits the following comments in opposition to the proposed changes.

## **I. General Comments**

The Department of Homeland Security’s Proposed Rule,<sup>2</sup> if published in their current form, would remove the regulatory requirement that initial Employment Authorization Document (EAD) applications for asylum applicants be adjudicated within 30 days of submission. CLINIC strongly opposes this change and urges DHS to withdraw this portion of the proposed regulation. Eliminating this 30-day regulatory requirement during which USCIS must adjudicate the EAD application will remove an important safeguard for asylum seekers eager to be self-sufficient and assimilate into our American economy. Without this safeguard, asylum seekers will be unable to sustain themselves as they await adjudication of their asylum claim.

By depriving asylum seekers of the ability to support themselves and their families, the government’s proposed regulations would cause lasting harm to vulnerable people fleeing persecution and seeking refuge in the United States.

CLINIC does not oppose the rule change that would allow asylum applicants to submit EAD renewal applications more than 90 days before expiration, although we believe the rule should include further safeguards as discussed in Section X of this comment below; all other comments concern the removal of the 30 day adjudication timeframe.

## **II. Background**

Until 1994, asylum seekers could file an application for asylum and work authorization concurrently.<sup>3</sup> In 1994, the regulations were amended to state that “an asylum applicant [would] not be eligible to apply for employment authorization based on his or her asylum application until

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<sup>1</sup> Pope Francis, *Address to Participants in the Plenary of the Pontifical Council for the Pastoral Care of Migrants and Itinerant People*, (May 24, 2013), [http://w2.vatican.va/content/francesco/en/speeches/2013/may/documents/papa-francesco\\_20130524\\_migranti-itineranti.html](http://w2.vatican.va/content/francesco/en/speeches/2013/may/documents/papa-francesco_20130524_migranti-itineranti.html).

<sup>2</sup> DHS Docket No. USCIS-2018-0001, RIN 1615-AC19, *Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications*, <https://www.govinfo.gov/content/pkg/FR-2019-09-09/pdf/2019-19125.pdf>. The Notice of Proposed Rulemaking is hereinafter referred in the text of these comments as “NPRM” and citations to it are based on the Federal Register page. The proposed regulations themselves are referred to as “proposed regulations” and are cited by the proposed number in the Code of Federal Regulations (CFR).

<sup>3</sup> See, 59 Fed. Reg. 14780 (Mar. 30, 1994) (“Such applications, submitted on Forms I-765, often accompany asylum applications.”).



150 days after the date on which the asylum application [was] filed.”<sup>4</sup> This new language created the EAD asylum clock.<sup>5</sup> Upon filing a complete application for asylum, the clock would begin to run.<sup>6</sup>

Once an asylum seeker applied for employment authorization, legacy Immigration and Naturalization Service (INS), then had 30 days to consider the EAD application; it could not, however, issue an EAD before the clock reached 180 days, unless it granted asylum to the applicant before that time.<sup>7</sup> One of the main objectives of the 30-day deadline was to promote timeliness.<sup>8</sup>

In 1996, Congress amended the INA incorporating language similar to the regulations.<sup>9</sup> Under the INA as amended, DHS may not issue an EAD to an asylum seeker whose application is pending until 180 days have passed from the date the asylum application is filed.<sup>10</sup> Current regulations require asylum seekers to wait 150 days from the time their I-589 (Application for Asylum and Withholding of Removal) is received by USCIS before they can file an initial request for employment authorization.<sup>11</sup> Upon receiving the initial EAD application, the regulations require USCIS<sup>12</sup> to grant or deny employment authorization within a 30-day timeframe.<sup>13</sup> Despite this regulatory requirement, according to the NPRM, by 2015, USCIS failed to adjudicate more than half of initial asylum applicants’ EADs within the required 30 days.<sup>14</sup>

Advocates brought a class action lawsuit, *Rosario v. USCIS*, in May 2015 seeking an injunction to order USCIS to comply with its own rule.<sup>15</sup> According to data cited in the *Rosario* court order, from 2010 to 2017, USCIS adjudicated 22 percent of initial EAD applications within 30 days—that is, out of 698,096 total applications, USCIS resolved only 154,629 applications on time.<sup>16</sup> USCIS moved to dismiss the suit and argued that the “30-day regulatory deadline is

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<sup>4</sup> 59 Fed. Reg. 62284, 62290 (Dec. 5, 1994)(codified as amended 8 CFR § 208.7) The amendments to 8 CFR § 208.7 were first proposed in 59 Fed. Reg. 14779 (Mar. 30, 1994)).

<sup>5</sup> 59 Fed. Reg. 62284, 62291. See also Nadine Wettstein et al., American Immigration Council and Penn State’s Center for Immigrants’ Rights, *Up Against the Clock: Fixing the Broken Employment Authorization Asylum Clock*, [https://www.americanimmigrationcouncil.org/sites/default/files/other\\_litigation\\_documents/asylum\\_clock\\_paper.pdf](https://www.americanimmigrationcouncil.org/sites/default/files/other_litigation_documents/asylum_clock_paper.pdf).

<sup>6</sup> David A. Martin, *Making Asylum Policy: the 1994 Reforms*, 70 WASH. L. REV. 725, 737-38, 754 (1995).

<sup>7</sup> 8 CFR § 208.7(a)(1) (1994).

<sup>8</sup> *Gonzalez Rosario v. United States Citizenship & Immigration Servs.*, 365 F. Supp. 3d 1156, 1161 (W.D. Wash. 2018)(“ the purpose of promulgating the 30-day deadline on top of that 150-day waiting period was to cabin what was already—in the agency’s view—an extraordinary amount of time to wait for work authorization. ..This context further elucidates that the 30-day deadline was instituted to promote timeliness.” [citations omitted].)

<sup>9</sup> See Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, § 604, 110 Stat. 3009, 115 (1996) (codified as amended INA § 208).

<sup>10</sup> INA § 208 (d)(2).

<sup>11</sup> 8 CFR § 208.7(a)(1).

<sup>12</sup> The Homeland Security Act of 2002 abolished INS and moved its functions to DHS. DHS has three immigration-related components: USCIS, United States Customs and Border Protection (CBP), and United States Immigration and Customs Enforcement (ICE). See Homeland Security Act of 2002, Pub. L. No. 107-296, §§ 451-471, 116 Stat. 2135, 2195-2205 (2002) (codified as 6 USC §§ 271-279, 291 (2002)).

<sup>13</sup> 8 CFR § 208.7(a)(1).

<sup>14</sup> 84 Fed. Reg. 47156 (Sep. 9, 2019).

<sup>15</sup> *Gonzalez Rosario v. United States Citizenship & Immigration Servs.*, 365 F. Supp. 3d 1156, 1161 (W.D. Wash. 2018).

<sup>16</sup> *Id.* at 1158.

discretionary.”<sup>17</sup> The *Rosario* court disagreed and in July 2018, the court held that not only did the “plain language of the regulation favor [] mandatory interpretation,” but “[r]eading the 30-day timeline as mandatory also comports with the regulation’s overall goals and related regulations.”<sup>18</sup>

Since July 2018, when the court in *Rosario* issued its injunction, USCIS has adjudicated 99 percent of initial EAD applications within 30 days<sup>19</sup> demonstrating that USCIS is capable of complying with the existing regulatory timeframe. Having lost in court, DHS now seeks to amend the regulations because it does not want to adjudicate asylum seekers’ EADs expeditiously, even though it has demonstrated that it is capable of doing so. DHS does not state anywhere in the NPRM that it is unable to meet the 30-day timeline; instead it vaguely says that officers who have been adjudicating asylum EADs “could” be doing something else.<sup>20</sup> The reasons DHS articulates for seeking to change this rule appear to be pretextual, and, in any event, could be addressed through other changes, as discussed below, that would not have the same devastating impact on vulnerable asylum seekers.

### **III. The Proposed Regulations Are a Significant Departure from Longstanding Practice and Contrary to Congressional Intent.**

When legacy INS issued the regulation requiring adjudication within 30 days of filing the EAD application, it was because the agency recognized that forcing asylum seekers to wait 150 days after filing an asylum application to seek an EAD would already incur a lengthy delay—180 days total. The focus on expediency is reinforced by how the agency described the 30-day deadline in 1994: “The INS will adjudicate these applications for work authorization within 30 days of receipt, regardless of the merits of the underlying asylum claim.”<sup>21</sup> Even though the agency imposed a 150-day waiting period before an asylum seeker may submit an initial EAD application, it made clear that “[i]deally... few applicants would ever reach the 150-day point.”<sup>22</sup>

Indeed, legacy INS selected 150 days because it was a period “beyond which it would not be appropriate to deny work authorization to a person whose claim had not been adjudicated.”<sup>23</sup> Thus, the purpose of promulgating the 30-day deadline in conjunction with the 150-day waiting period was to alleviate the impact of what was already—in the agency’s view—an extraordinary amount of time to wait for work authorization.<sup>24</sup> Congress accepted the concept of having asylum seekers

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<sup>17</sup> *Id.* at 1159.

<sup>18</sup> *Id.*

<sup>19</sup> Compliance Report, *Rosario* Litigation: USCIS I-765 – Application for Employment Authorization Eligibility, Category: CO8, Pending Asylum Initial Permission to Accept Employment Completions by Processing Time Buckets, FY15-FY19 (Through June 30, 2019), [https://www.americanimmigrationcouncil.org/sites/default/files/litigation\\_documents/nirp\\_v\\_uscis\\_defendants\\_july\\_2019\\_compliance\\_report.pdf](https://www.americanimmigrationcouncil.org/sites/default/files/litigation_documents/nirp_v_uscis_defendants_july_2019_compliance_report.pdf).

<sup>20</sup> 84 Fed. Reg. 47150. (“If the 30-day timeframe is removed, these redistributed resources *could* be reallocated, potentially reducing delays in processing of other applications, and avoiding costs associated with hiring additional employees.”)[emphasis added.]

<sup>21</sup> 59 Fed. Reg. 14780.

<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup> *Id.*, See also *Gonzalez Rosario v. United States Citizenship & Immigration Servs.*, 365 F. Supp. 3d 1156, 1161 (W.D. Wash. 2018.)

wait 180 days to have their asylum applications adjudicated when it amended the INA to codify the 180 day waiting period.<sup>25</sup>

The same humanitarian considerations included in the regulatory history of the 30-day timeframe were analyzed in the *Rosario* litigation when USCIS failed to meet its legal obligations. In issuing a court order to compel USCIS to adhere to the regulatory 30-day deadline, the *Rosario* court concluded that “the balance [of equities] has been struck in favor of expedient adjudication of initial EAD applications so that asylum seekers may obtain work authorization when waiting—often for years—to have their asylum applications resolved.”<sup>26</sup> *Rosario* goes on to state that delays are:

‘less tolerable when human health and welfare are at stake,’ and that is exactly what is at stake here: Asylum seekers are unable to obtain work when their EAD applications are delayed and consequently, are unable to financially support themselves or their loved ones... This negative impact on human welfare is further compounded by the length of USCIS’s delay.<sup>27</sup>

The *Rosario* court found that USCIS’s delay in resolving EADs was unreasonable and that “resource constraints” was an inappropriate justification when human welfare is concerned.<sup>28</sup>

The *Rosario* court was compelled to issue injunctive relief because of the human welfare costs that delays to adjudicating EADs place on asylum seekers. Oftentimes, asylum seekers flee their countries with nothing more than clothes on their back and the cash in their pockets. They come with their life savings that are quickly depleted on living expenses while they await adjudication of their asylum claims.<sup>29</sup> Asylum seeking families have limited means and struggle to pay for necessities such as food and shelter.<sup>30</sup> Preserving the 30-day EAD timeframe is consistent with Congressional intent and the *Rosario* court decision both of which recognized an EAD as an important humanitarian protection for vulnerable asylum seekers.

#### **IV. DHS’s Justifications for Delaying the Ability of Asylum Seekers to Support Themselves Are Based on Incomplete Data or a Lack of Data Altogether.**

In estimating the costs and benefits of removing the 30-day timeframe, the proposed regulations rely on the assumption that USCIS would return to its adjudication rate from 2017—before the

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<sup>25</sup> INA § 208(d)(2).

<sup>26</sup> *Gonzalez Rosario*, 365 F. Supp. 3d at 1161; *See also Biodiversity Legal Foundation v. Badgley*, 309 F.3d 1166, 1177 (9th Cir. 2002).

<sup>27</sup> *Gonzalez Rosario*, 365 F. Supp. 3d at 1162, quoting *Telecommunications Research & Action Center v. F.C.C.*, 750 F.2d 70, 80 (D.C. Cir. 1984).

<sup>28</sup> *Id.* at 1163, footnote 6: “To the extent Defendants rely on resource constraints as a standalone argument, that argument is unavailing. The Supreme Court recently rejected a similar argument from an agency citing “a number of practical concerns.” *Pereira v. Sessions*, -- U.S. --, 138 S. Ct. 2105, 2118 (2018). The Court found these “meritless” considerations “do not justify departing from the [law’s] clear text.” *Id.* The court concludes the same here.

<sup>29</sup> Lindsay M. Harris & Joan Hodges-Wu, “Asylum seekers leave everything behind. There’s no way they can pay Trump’s fee.” WASHINGTON POST, May 1, 2019, <https://www.washingtonpost.com/outlook/2019/05/01/asylum-seekers-leave-everything-behind-theres-no-way-they-can-pay-trumps-fee/>.

<sup>30</sup> Human Rights Watch, “We Can’t Help You Here. U.S. Returns Asylum Seekers to Mexico,” July 2, 2019, <https://www.hrw.org/report/2019/07/02/we-cant-help-you-here/us-returns-asylum-seekers-mexico>.

*Rosario* court order. But the NPRM does not explain why USCIS would return to this prior adjudication timeframe. The NPRM states that before the *Rosario* litigation, USCIS adjudicated 78 percent of asylum seekers' initial EAD applications within 60 days and only 47 percent within 30 days.<sup>31</sup> But the NPRM fails to take into account that the reason USCIS adjudicated these EADs as quickly as it did was because **they were under a legal requirement to do so**. Even with a regulation requiring the EADs to be adjudicated within 30 days, USCIS failed to do so more than half the time. And the data DHS relies on in the NPRM paints the agency's adjudications in a more positive light than the statistics submitted to the *Rosario* court by USCIS. In that litigation, USCIS claimed to timely resolve only 28 percent of initial EAD applications.<sup>32</sup> Regardless of which figure is correct, DHS does not dispute that even with a time limit imposed, it did not meet it most of the time. There is little reason to believe that DHS will adjudicate EADs within 60 days, or even within 90 days,<sup>33</sup> if there is no requirement for it to do so.<sup>34</sup>

#### **V. The Proposed Regulation's Purported Reliance on Security Concerns Are Misplaced.**

The NPRM claims that the government needs more time to process EAD applications because of outdated application procedures that were in operation at the time the 30-day timeframe was established.<sup>35</sup> However, the government's changes in processing EAD applications were fully implemented by 2006.<sup>36</sup> There is no reason, more than a decade after these changes have been fully implemented for DHS to assert now that it cannot process the EAD applications within 30 days.

Likewise, the NPRM states that USCIS needs more time to adjudicate asylum EAD applications because of changes to vetting procedures and increased background checks resulting from the U.S. government's response to the September 11, 2011 terror attacks ("9/11"). Yet, these changes have been in place since 2004 with the creation of the Office of Fraud Detection and National Security (FDNS).<sup>37</sup> USCIS has had well over a decade to implement post-9/11 enhanced vetting and security checks and has been vetting asylum applicants with these criteria for fifteen years.

DHS used a similar national security and vetting argument in the *Rosario* litigation. In its decision, the *Rosario* court noted that the government's security concerns were too vague to justify failure to comply with the 30-day processing deadline. The court found that practical concerns did not

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<sup>31</sup> 84 Fed. Reg. 47149, 47162.

<sup>32</sup> *Gonzalez Rosario*, 365 F. Supp. 3d at 1159.

<sup>33</sup> As discussed below, the NPRM posits the possibility of imposing a 90-day processing time but rejects even this longer time requirement, choosing instead to have no limit on the time an asylum seeker's initial EAD application can remain pending.

<sup>34</sup> Immigration advocates have reported that USCIS has slowed processing for many application types since 2017. See American Immigration Lawyers Association, *Deconstructing the Invisible Wall: How Policy Changes by the Trump Administration Are Slowing and Restricting Legal Immigration*, Mar. 19, 2018, <https://aila.org/infonet/aila-report-deconstructing-the-invisible-wall>.

<sup>35</sup> 84 Fed. Reg. p. 47154.

<sup>36</sup> *Id.* at 47154, footnote. 17.

<sup>37</sup> *Id.* at 47154-55.

justify departing from the law’s clear text,<sup>38</sup> especially when the agency’s delay in adjudicating EADs was found to negatively impact human welfare.<sup>39</sup>

After the *Rosario v. USCIS* decision, USCIS dedicated resources to comply with the court order to timely process asylum pending EAD applications. Despite the existence of production and vetting changes that the rulemaking lists as justification for the removal of the 30-day timeframe, DHS compliance reports demonstrate that USCIS is currently deciding over 99 percent of EADs within the 30-day processing timeline.<sup>40</sup> This statistic proves that USCIS has the ability to adjudicate EADs within a 30-day timeframe, demonstrating that DHS’s fraud and security concerns can be addressed within the 30-day processing time.

In any event, processing an EAD only gives an asylum seeker the authority to work lawfully in the United States. If the government has actual concerns that a particular asylum seeker could pose a national security threat, not adjudicating the EAD would not alleviate the threat—whether or not the asylum seeker can work lawfully, he or she is still physically present in the United States.

#### **VI. DHS Could Achieve Its Stated Goals by Removing the 150-Day Prohibition on Filing an Asylum Pending Initial EAD and Allowing Asylum Seekers to File EAD Applications Concurrently with the Asylum Application.**

If DHS truly needs more than 30 days to complete security checks and produce more sophisticated EAD cards, it should allow asylum seekers to file their initial EAD applications concurrently with their asylum applications, as was the practice prior to 1994.<sup>41</sup> Under INA § 208(d)(2), USCIS cannot issue the EAD until 180 days have passed, but nothing prevents USCIS from accepting the EAD application immediately and performing the necessary security checks once the asylum application is filed. Indeed, if an individual poses a threat to national security, it would be best for USCIS to identify that threat as soon as possible, rather than waiting more than 150 days after filing the asylum application to engage in a vetting process.

#### **VII. The NPRM Does Not Adequately Explain Why USCIS Cannot Hire More Officers.**

The NPRM makes sweeping claims about the high costs of alternatives to the removal of the 30-day timeframe, but fails to support these claims with any statistics or information. For example, USCIS could hire more officers but the NPRM admits that DHS has not estimated the costs of this alternative.<sup>42</sup> The rulemaking suggests that it would be too expensive to hire additional officers to keep up with timely processing and cites to “the historic asylum backlog.”<sup>43</sup> However, this

<sup>38</sup> *Gonzalez Rosario*, 365 F. Supp. 3d at 1163, footnote. 6, quoting *Pereira v. Sessions*, -- U.S. --, 138 S. Ct. 2105, 2118 (2018).

<sup>39</sup> *Gonzalez Rosario*, 365 F. Supp. 3d at 1162.

<sup>40</sup> Compliance Report, *Rosario Litigation: USCIS I-765 – Application for Employment Authorization Eligibility, Category: CO8, Pending Asylum Initial Permission to Accept Employment Completions by Processing Time Buckets, FY15-FY19* (Through June 30, 2019),

[https://www.americanimmigrationcouncil.org/sites/default/files/litigation\\_documents/nirp\\_v\\_uscis\\_defendants\\_july\\_2019\\_compliance\\_report.pdf](https://www.americanimmigrationcouncil.org/sites/default/files/litigation_documents/nirp_v_uscis_defendants_july_2019_compliance_report.pdf).

<sup>41</sup> See, 59 Fed. Reg. 14780 (“Such applications, submitted on Forms I-765, often accompany asylum applications.”).

<sup>42</sup> 84 Fed. Reg. 47149.

<sup>43</sup> *Id.*



reasoning appears to be pretextual since the proposed regulations only deal with initial EADs filed by asylum seekers and not EAD renewals for asylum seekers whose cases are stuck in the asylum office backlog.

Moreover, the NPRM states that DHS wants more “flexibility” but does not offer any data about how the 30-day adjudications of asylum seekers’ EADs have affected any other application types. There is not a scintilla of data showing that but for the 30 day timeframe for initial asylum EADs, other applications would not be subject to backlogs. Instead, the NPRM states, “If the 30-day timeframe is removed, these redistributed resources *could be* reallocated, *potentially* reducing delays in processing of other applications, and avoiding costs associated with hiring additional employees. USCIS has not estimated these avoided costs.”<sup>44</sup> [emphasis added.] Thus DHS is not even committing to reducing wait times for other types of applications if it removes the 30-day timeframe for these EAD applications.

The NPRM also disingenuously states, “Hiring more officers could bring improvements but that would not *immediately* shorten adjudication timeframes because additional time would be required to onboard new employees, and train them.”<sup>45</sup> [emphasis added.] The issue is not whether hiring officers would “immediately” shorten timeframes, it is whether doing so would address the issue long-term. If USCIS hired more officers and trained them, within a few months there would be more trained officers who could adjudicate these applications expeditiously. DHS instead rejects out of hand the possibility of hiring more officers, and does not even provide an estimate of the cost of hiring more officers, nor does it engage in an economic analysis of the cost of hiring new officers as compared to the loss to the tax base by preventing asylum seekers from working lawfully and paying taxes. Even DHS admits in the NPRM that asylum seekers would lose annual salary wages and benefits totaling between \$255.88 million to \$774.76 million.<sup>46</sup>

### **VIII. If Not Fully Withdrawn, the Proposed Regulations Should Provide an Alternative Timeframe for Adjudicating Asylum EADs.**

The elimination of the 30-day rule without providing an alternative maximum processing time is excessively harsh. The NPRM briefly mentions that DHS considered proposing a 90-day EAD adjudication timeframe to replace the current 30-day window but deemed this amount of time to be inadequate.<sup>47</sup> The fact that DHS simultaneously claims that it would likely adjudicate these EAD applications within 60 days of filing,<sup>48</sup> and that it cannot commit to adjudicating these applications within 90 days seems to indicate that DHS does not actually intend to adjudicate applications within 60 days.

DHS further rejects its own consideration of a 90-day timeframe because that timeframe would also result in financial losses to the asylum seeker, employers who hire asylum seekers, and the federal government through lost income tax revenue.<sup>49</sup> But these losses would increase

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<sup>44</sup> *Id.* at 47165.

<sup>45</sup> *Id.*

<sup>46</sup> *Id.* at 47150.

<sup>47</sup> *Id.* at 47166 - 47167.

<sup>48</sup> *Id.* at 47149.

<sup>49</sup> *Id.* at 47167, Table 12.

significantly if the timeframe would be entirely eliminated as the rulemaking proposes and asylum seekers are forced to wait longer than 90 days (meaning 240 days since they can't file at all for 150 days). Finally, the proposed regulations do not address the fact that the majority of these losses will be nonexistent if the timeframe remains the same.

### **IX. The Proposed Regulations Do Not Recognize that Asylum Seekers Are Fleeing Persecution and that Congress Has Therefore Afforded Them Special Protections.**

Asylum seekers are among the most vulnerable noncitizens in the United States. The U.S. government does not provide asylum seekers with housing, stipends, or government appointed counsel. Asylum seekers who cannot work would have difficulty obtaining healthcare and medical treatment, identification documents such as drivers' licenses,<sup>50</sup> and legal counsel for their underlying asylum applications, making it much less likely that they will prevail on their applications.<sup>51</sup> The rule change would also cause significant hardship to asylum seekers' families and destabilize the financial and health situation their children, spouses, parents, and other family members. Additionally, charities, including faith-based social services organizations, will be forced to expend limited resources to help asylum seekers with subsistence while they wait longer for the ability to support themselves through work.

Asylum seekers' work authorization should be prioritized by USCIS, even assuming, arguendo, that complying with the 30-day rule would mean that some other categories of EAD applications are delayed in adjudication because asylum seekers are among the most vulnerable populations in the world. As Pope Francis has said, "Developing countries continue to be drained of their best natural and human resources for the benefit of a few privileged markets. . . . Those who pay the price are always the little ones, the poor, the most vulnerable, who are prevented from sitting at the table and are left with the 'crumbs' of the banquet."<sup>52</sup> Rather than place additional hurdles<sup>53</sup>

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<sup>50</sup> Immigration and Customs Enforcement (ICE) Factsheet, "Applying for a Driver's License or State Identification Card," Updated Sep. 5, 2012, [https://www.ice.gov/doclib/sevis/pdf/dmv\\_factsheet.pdf](https://www.ice.gov/doclib/sevis/pdf/dmv_factsheet.pdf).

<sup>51</sup> Asylum seekers cannot afford legal representation without the ability to lawfully work, and asylum seekers represented by legal counsel are nearly four times more likely to win their cases than those appearing in immigration court without an attorney. See, Human Rights First, *Fact Sheet: Central Americans were Increasingly Winning Asylum Before President Trump Took Office*, (Jan. 2019), [https://www.humanrightsfirst.org/sites/default/files/Asylum\\_Grant\\_Rates.pdf](https://www.humanrightsfirst.org/sites/default/files/Asylum_Grant_Rates.pdf); see also TRAC, *Asylum Decisions by Custody, Representation, Nationality, Location, Month and Year, Outcome and More*, (through Aug. 2019), <https://trac.syr.edu/phptools/immigration/asylum/>.

<sup>52</sup> Gerard O'Connell, *Pope Francis Reminds Christians that Migrants and Refugees Should Be Welcomed Around the World*, AMERICAN THE JESUIT REVIEW, Sep. 29, 2019, <https://www.americamagazine.org/faith/2019/09/29/pope-francis-reminds-christians-migrants-and-refugees-should-be-welcomed-around>.

<sup>53</sup> In the past two years, asylum seekers have faced unprecedented restrictions on their ability to exercise their right to seek safety in the United States. The government has sought to impose an Asylum Ban (barring those who enter the U.S. without inspection from eligibility to seek asylum) EOIR Docket No. 18-0501, A.G. Order No. 4327-2018, RIN 1125-AA89, 1615-AC34, Aliens Subject to a Bar on Entry Under Certain Presidential Proclamations, Procedures for Protection Claims, <https://www.federalregister.gov/documents/2018/11/09/2018-24594/aliens-subject-to-a-bar-on-entry-under-certain-presidential-proclamations-procedures-for-protection> which is currently enjoined. It has implemented a Third Country Transit Bar, EOIR Docket No. 19-0504, A.G. Order No. 4488-2019, RIN 1125-AA91, 1615-AC44, 84 Fed. Reg. 33829, Asylum Eligibility and Procedural Modifications, <https://www.federalregister.gov/documents/2019/07/16/2019-15246/asylum-eligibility-and-procedural->

before asylum seekers in their quest for self-sufficiency, the U.S. government should be welcoming the stranger and allowing asylum seekers to provide for themselves and their families by issuing employment authorization as quickly as legally possible under the INA.

**X. CLINIC Supports Removing the Requirement that Asylum Seekers Cannot Submit EAD Renewals Until 90 Days Before Expiration but Believes the Regulations Should Include Further Safeguards.**

The proposed regulations would also remove the current requirement<sup>54</sup> that asylum seekers' applications for EAD renewal be filed and received by USCIS at least 90 days prior to the expiration of the employment authorization. This change would allow asylum applicants to have their EADs automatically extended for up to 180 days from their expiration date if they file a Form I-765 renewal application before their current employment authorization expires<sup>55</sup> but not more than 180 days before expiration.<sup>56</sup> CLINIC supports the rule change which allows for asylum seekers to submit their EAD renewal application more than 90 days before the EAD expires, however CLINIC also urges DHS to set a timeframe for adjudicating renewals because, even with the automatic extension, we have heard of asylum applicants not receiving their EAD renewal cards by the time the automatic extension ends. Moreover, many employers are not aware of the automatic extension rules and asylum seekers often rely on their EADs as a primary form of government-issued identification. Thus the automatic extension should not be seen as a substitute for DHS timely issuing physical EAD renewal cards.

**XI. Conclusion**

For all of the reasons discussed above, CLINIC urges that the rule change removing the 30 day adjudication requirement be withdrawn. To address the security vetting concerns DHS uses to justify the proposed rule, CLINIC urges DHS to return to pre-1994 rules which allow asylum seekers to file their employment authorization application concurrently with the asylum application, thus giving DHS the full 180 days to perform security checks. In the alternative, if DHS does not fully withdraw this requirement, CLINIC urges DHS to adopt a slightly longer required processing timeframe, such as 60 days—the timeframe DHS claims it will process most asylum seekers' EADs in the NPRM. If DHS were to adopt a longer required processing time, the regulation should still provide for initial asylum seekers' EAD application to be processed within 180 days of filing for asylum.

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[modifications](#) preventing those who have transited through a country on the way to the southern border from being eligible for asylum. It has forced vulnerable asylum seekers to wait in dangerous conditions in Mexico while their cases are pending in the United States, "Migrant Protection Protocols" <https://www.ice.gov/factsheets/migrant-protection-protocols-mpp>. And it has announced its intentions to charge a fee for asylum applications Presidential Memorandum for the Attorney General and Secretary of Homeland Security on Additional Measures to Enhance Border Security and Restore Integrity to Our Immigration System (April 29, 2019), <https://www.whitehouse.gov/presidential-actions/presidential-memorandum-additional-measures-enhance-border-security-restore-integrity-immigration-system/>.

<sup>54</sup> 8 CFR § 208.7(d).

<sup>55</sup> 8 CFR § 274a.13(d), as amended in 2017. Additionally asylum applicants must be, *inter alia*, requesting renewal based on the same employment authorization category under which the expiring EAD was granted.

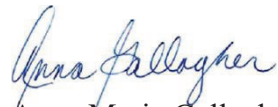
<sup>56</sup> 84 Fed. Reg. 47155, footnotes 23, 24.



The Trump administration wants to deter asylum seekers from seeking protection in the United States and this proposed regulation appears to be a further attempt<sup>57</sup> to do so. President Trump has said, “The biggest loophole drawing illegal aliens to our borders is the use of fraudulent or meritless asylum claims to gain entry into our great country.”<sup>58</sup> It is immoral to paint the “least ones”<sup>59</sup> among us as liars without any proof of this claim. It is inappropriate to call asylum seekers “illegal aliens” because seeking asylum is not illegal. All individuals have the right to seek protection from persecution and the United States has committed itself to protecting this right through its ratification of the Refugee Convention and Protocol, and the Convention Against Torture<sup>60</sup> and while these claims are pending asylum seekers have the right to work and support themselves.

Thank you for the opportunity to submit these comments. We appreciate your consideration. Please do not hesitate to contact Michelle Mendez, Director of CLINIC’s Defending Vulnerable Populations Project, at [mmendez@cliniclegal.org](mailto:mmendez@cliniclegal.org) should you have any questions about our comments or require further information.

Sincerely,



Anna Marie Gallagher  
Executive Director

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<sup>57</sup> In the past two years, the government has issued executive orders, precedential decisions by the attorney general, regulations, and informal policy changes explicitly designed to prevent asylum seekers from exercising their rights under U.S. law. *See*, National Immigrant Justice Center, *A Timeline of the Trump Administration’s Efforts to End Asylum*, (Aug. 27, 2019), <https://www.immigrantjustice.org/staff/blog/timeline-trump-administrations-efforts-end-asylum>.

<sup>58</sup> White House Fact Sheet, *President Donald J. Trump Is Working to Stop the Abuse of Our Asylum System and Address the Root Causes of the Border Crisis* (Apr. 29, 2019), <https://www.whitehouse.gov/briefings-statements/president-donald-j-trump-working-stop-abuse-asylum-system-address-root-causes-border-crisis/>.

<sup>59</sup> *Matthew* 25:40-45.

<sup>60</sup> Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, opened for signature Dec. 10, 1984, Foreign Affairs Reform and Restructuring Act of 1998, Pub. L. No. 105-277, § 2242, 112 Stat. 2681 (1998), 1465 U.N.T.S. 85.

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-gs5u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0169

Comment Submitted by Lola Story

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## Submitter Information

**Name:** Lola Story

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## General Comment

It is time to stop all the whining & crying and support President Trump with the Immigration Reform. Remember the elections are just a few days away!

AR001739

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0170

Comment Submitted by Mike Robinson

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## Submitter Information

**Name:** Mike Robinson

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## General Comment

I FULLY Support President Trumps Immigration REFORMS! If YOU Want MY Vote, SO WILL YOU!!!!!!

AR001740

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-amqt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0171

Comment Submitted by Karen Piercy

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## Submitter Information

**Name:** Karen Piercy

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## General Comment

Our President is doing his best to help our country,please support him in this effort.

AR001741

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0172

Comment Submitted by Edward Liebel

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## Submitter Information

**Name:** Edward Liebel

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## General Comment

It is so unsettling to myself and ALL AMERICANS that you and many other radicals find it impossible to support our President. You are not doing the job that you were assigned to do. WE THE PEOPLE DEMAND that you support President Trumps immigration reforms - immediately.

AR001742

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-2ylh <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0173

Comment Submitted by Teresa Daawson

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## Submitter Information

**Name:** teresa daawson

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## General Comment

Please support our Presidents immigration reforms. We need to get these people back across the border.

AR001743

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0174

Comment Submitted by Ken Bower

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## Submitter Information

**Name:** Ken Bower

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## General Comment

The Law should be changed as 30 days is not enough time to vet this Migrants, if the can't be vetted they must return home and come back again! We must never release these in vetted People in America, as we have a right to know who they are and what their intentions are! The sale a d Safety of all Americans demand we have a tough strick policy in order to protect this Nation!

AR001744

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0175

Comment Submitted by Roseanne Conforto

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## Submitter Information

**Name:** Roseanne Conforto

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## General Comment

It is urgent that you support President Trumps immigration reform

AR001745



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0176

Comment Submitted by Sylvia Harris

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## Submitter Information

**Name:** Sylvia Harris

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## General Comment

I urge you to support immigration reforms! The current system punishes people for coming here legally. Adequate time must be allowed to do background checks on every asylum seeker that comes to our country and applies for a work permit! Please protect our national security by supporting President Trump's immigration reforms!

AR001746

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0177

Comment Submitted by Lake Speed

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## Submitter Information

**Name:** Lake Speed

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## General Comment

Support President Trump's Immigration Reforms!

Stop the Job stealers, drug smugglers, human traffickers and Gang members from killing us and our children!

Your family members can be next to die from this uncalled for mess!

AR001747

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0178

Comment Submitted by Lawrence Farren

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## Submitter Information

**Name:** lawrence farren

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## General Comment

Please fight for American's right to secure our borders.

AR001748

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0179

Comment Submitted by Patsy Ross

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## Submitter Information

**Name:** Patsy Ross

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## General Comment

Let President Trump do his job!

AR001749

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0180

Comment Submitted by Marsha Sayler

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## Submitter Information

**Name:** Marsha Sayler

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## General Comment

Instead of working with President Trump to fix our broken immigration system, radical Leftists are fighting to protect the Beltways beloved status quo.

They don't care that the current system punishes people for coming here LEGALLY or that it weakens our national security.

by law, the Trump Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

This forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are playing by the rules. Thats INSANE!

Why the Left is supporting a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline is beyond me.

This has to change and it must change NOW!

Thats why Im asking you to help President Trump and Ken Cuccinelli remove these ridiculous restrictions and secure Americas safety.

AR001750

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0181

Comment Submitted by James Strutz

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## Submitter Information

**Name:** James Strutz

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## General Comment

SUPPORT THE PRESIDENTS IMMIGRATION REFORM AND STOP ILLEGALS, DRUGS AND GANGS FROM ENTERING OUR COUNTRY!!! YOU WILL BE HELD ACCOUNTABLE!!!

AR001751

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-yjif <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0182

Comment Submitted by James Steenburgh

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## Submitter Information

**Name:** James Steenburgh

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## General Comment

Please support President Trump's Immigration Reforms, we need a secure border.

AR001752

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0183

Comment Submitted by Michael Robinson

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## Submitter Information

**Name:** MICHAEL ROBINSON

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## General Comment

Support all of the presidents reforms on immigration now or pay the price at the ballot box ! No exceptions.

AR001753



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0184

Comment Submitted by Priscilla Kennedy

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## Submitter Information

**Name:** Priscilla Kennedy

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## General Comment

I am SURE you bureaucrats must realize that by law, the Trump Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

This forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are playing by the rules. Thats INSANE!

Why the Left is supporting a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline is beyond me.

This has to change and it must change NOW!

Thats why Im asking you to help President Trump and Ken Cuccinelli remove these ridiculous restrictions and secure Americas safety.....TRUE American citizens and LEGAL immigrants deserve to come FIRST!

AR001754

# PUBLIC SUBMISSION

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<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-jwly
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0185

Comment Submitted by Myra Lanham

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## Submitter Information

**Name:** Myra Lanham

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## General Comment

Washington is packed with idiots. Republicans are a big disappointment; wolves dressed as Republicans. Trump is doing a great job, but only has a handful of helpers. We need to PRAY as weve never prayed.

AR001755

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-3vj8 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0186

Comment Submitted by Jan Fleetwood

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## Submitter Information

**Name:** Jan Fleetwood

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## General Comment

I support President Trump's immigration reform plan. I am against illegal immigration and support securing the border.

AR001756

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-sdbs
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0187

Comment Submitted by Ronald Antinora

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## Submitter Information

**Name:** RONALD ANTINORA

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## General Comment

SUPPORT PRES. TRUMPS IMMIGRATION REFORMS NOW..

AR001757

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-36zh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0188

Comment Submitted by Thomas Love

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## Submitter Information

**Name:** Thomas Love

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## General Comment

Yes, we need the immigrants to visit America to work. It helps America and the motivated immigrants to provide substance to families back home. This is a win-win for all.

AR001758

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-2izz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0189

Comment Submitted by Virginia Perry

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## Submitter Information

**Name:** Virginia Perry

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## General Comment

I support President Trump's Immigration reforms. I am concerned about America's national security and safety!

AR001759

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-yb4h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0190

Comment Submitted by Jesse Rochester

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## Submitter Information

**Name:** Jesse Rochester

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## General Comment

Please support the President's reforms.

AR001760

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-7pt2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0191

Comment Submitted by Tammy Woten

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## Submitter Information

**Name:** Tammy Woten

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## General Comment

No more immigration

AR001761



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-4rrt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0192

Comment Submitted by Bryan Fowler

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## Submitter Information

**Name:** Bryan Fowler

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## General Comment

Why don't you people just do what the President has proposed and just get're done...!!!!!!  
Thank you so much,

AR001762

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-s8f6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0193

Comment Submitted by Kathy Box

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## Submitter Information

**Name:** Kathy Box

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## General Comment

By Law, the Trump Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.  
You can't cut corners and break our security.

AR001763

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-yutu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0194

Comment Submitted by Roy Ruprecht

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## Submitter Information

**Name:** Roy Ruprecht

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## General Comment

You need to stop this mass migration of immigrants coming to the US illegally. They need to be checked out before they get here.

AR001764

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-71ma
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0195

Comment Submitted by Bulinda Deti

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## Submitter Information

**Name:** Bulinda Deti

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## General Comment

I support President Trump on every issue. We need to stop the invasion of our country by any means necessary and the people that want to come here to live needs to go through a vetting process like my grandparents did when they came here from Italy.

AR001765

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-ud0a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0196

Comment Submitted by Joy Rmmons

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## Submitter Information

**Name:** Joy Rmmons

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## General Comment

It is past time to correct immigration laws.

AR001766

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-bgdp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0197

Comment Submitted by Brian Legere

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## Submitter Information

**Name:** Brian Legere

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## General Comment

Please do the right thing. Prevent illegal aliens from entering. If someone crosses the boarder without proper approval they shouldnt be in the US.

Illegal Aliens seem to have more rights than citizens. Thats simply not right.

AR001767

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-m9gi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0198

Comment Submitted by Shayna Oppen- Franks

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## Submitter Information

**Name:** Shayna Oppen-Franks

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## General Comment

Its imperative to screen anyone looking to move into the country. Common sense. Dont fight good ideas just because you dont like the messenger.

PS: Thank you President Trump

AR001768

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-ylhm <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0199

Comment Submitted by Rossanne Lopez

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## Submitter Information

**Name:** rossanne lopez

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## General Comment

Please support President trumps immigration forms I believe in it and I think its right  
thank you

AR001769



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-t13h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0200

Comment Submitted by Penelope Ashley

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## Submitter Information

**Name:** Penelope Ashley

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## General Comment

Please support President Trump's Immigration Reforms. It is impossible to investigate aliens within 30 days.

AR001770

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-5wn2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0201

Comment Submitted by Christina Tolin

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## Submitter Information

**Name:** Christina Tolin

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## General Comment

Need to support President Trump 100% with immigration reforms.

AR001771

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-7kpt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0202

Comment Submitted by Anne Donovan

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## Submitter Information

**Name:** Anne Donovan

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## General Comment

Support President Trumps immigration reform. Stop birth right, chain migration, People need to have a trade, then we will have less people on social programs! AND, BUILD the SOUTHERN BORDER WALL now! Vote Republican not the spineless, unwilling to impeach OMAR, and the monies she received from Turkey, enough of democratic socialist party.

AR001772

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-w7i2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0203

Comment Submitted by Linda Mroczkowski

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## Submitter Information

**Name:** Linda Mroczkowski

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## General Comment

Giving immigration officials 20 or even 30 days to check for dangerous illegal aliens at our border is ridiculous. Stop dying their hands and give them the support and time they need to keep our country safe.

AR001773

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-d4jd <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0204

Comment Submitted by Jack Chenneville

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## Submitter Information

**Name:** Jack Chenneville

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## General Comment

Stop blocking everything President Trump is trying to do for our country.

AR001774

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-3u9m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0205

Comment Submitted by Jean Lizzio

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## Submitter Information

**Name:** Jean Lizzio

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## General Comment

I support our President and demand our borders be safe and secure with immigration reform.

AR001775

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-bu8q
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0206

Comment Submitted by Patricia Anderson

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## Submitter Information

**Name:** Patricia Anderson

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## General Comment

Support our president's immigration reforms. This 30 day deadline is preposterous and you know it. You democrats are losing support hand over fist daily with your anti American madness!

AR001776

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-p1vz <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0207

Comment Submitted by Jesse Piraquive

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## Submitter Information

**Name:** Jesse Piraquive

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## General Comment

Please support our President and all his immigration reforms.

AR001777



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-3xv6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0208

Comment Submitted by Charles Wills

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## Submitter Information

**Name:** Charles Wills

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## General Comment

Please support President Trump's immigration reforms. His agenda is a great one, trust in and give his plans a fair chance and full support please.

AR001778

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-ar2i
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0209

Comment Submitted by Sharon Tuten

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## Submitter Information

**Name:** Sharon Tuten

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## General Comment

Support President Trump's Immigration Reforms and throw out that ridiculous time frame. These illegal asylum seekers know the system and plays on them, send them back to wait their turn. If it takes a month or a year for a thorough back ground check so be it, at least we will know who or what is coming into our country.

AR001779

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-bd34
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0210

Comment Submitted by Donna Garmon

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## Submitter Information

**Name:** Donna Garmon

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## General Comment

Stand with the Pres. on immigration reform! He's doing what we elected him to do!!

AR001780

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-nnqo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0211

Comment Submitted by Lois Van Kirk

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## Submitter Information

**Name:** Lois Van Kirk

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## General Comment

Build the Wall, institute E-verify, end birthright citizenship, end the visa lottery. PUT AMERICANS FIRST.

AR001781

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d53-ptwt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0212

Comment Submitted by Richard Totels

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## Submitter Information

**Name:** Richard Totels

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## General Comment

Support Trump's Immigration Reforms.

AR001782

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d53-4mhq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0213

Comment Submitted by Albert Posey

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## Submitter Information

**Name:** Albert Posey

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## General Comment

There is no reason to have a deadline on time to vet an immigrant, there is a need to limit the number of immigrants we let in the country and not overload our system.

AR001783

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d52-caka
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0214

Comment Submitted by Sharron Gibbons

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## Submitter Information

**Name:** Sharron Gibbons

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## General Comment

Please support President Trump's immigration reforms and end all the nonsense that's being perpetrated by the opposition. The partisan "noise" must stop and consider what is best for the American population and our country at large - those who voted Trump in as our President.

AR001784

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d52-lz7q
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0215

Comment Submitted by Jane Dams

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## Submitter Information

**Name:** Jane Dams

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## General Comment

We are tired of all the crap going on in Washington d.c.. it is time for you to do the job we sent you there for. Work on stopping illegal immigration. Stop all support given to them. A month is not enough time to process illegals. Also, what about the budget? Doesn't it need balancing?

AR001785



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d52-tfg5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0216

Comment Submitted by Liz Dvorak

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## Submitter Information

**Name:** Liz Dvorak

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## General Comment

Time the Democrats go by the Law & stop changing the rules to fit them.

AR001786

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d52-r7l4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0217

Comment Submitted by Kimberly Downes

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## Submitter Information

**Name:** Kimberly Downes

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## General Comment

I'm standing with our President Mr. TRUMP2020!

AR001787

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d52-61c2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0218

Comment Submitted by Arthur Kennedy

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## Submitter Information

**Name:** Arthur Kennedy

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## General Comment

Enough already. The Party of nosecone must stop this lunacy and get back to the work necessary to keep this Nation strong. We are not paying you to play stupid games and this impeachment process is beyond stupid...No facts after over 3 years. Give it up.

AR001788

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d52-5j59
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0219

Comment Submitted by James Mullins

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## Submitter Information

**Name:** james mullins

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## General Comment

Secure our border now,stop illegals and terrorists from entering our country unrestricted, stop all these unnecessary rules and regulations on the border patrol agents and let them do their job.

AR001789

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d52-3lxz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0220

Comment Submitted by Mykle McSherry

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## Submitter Information

**Name:** Mykle McSherry

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## General Comment

I refuse to be part of a nation that doesnt allow due process to the vetting process for anyone entering our country.

This is unsafe to every single one of us in this country including you fix this now or you will be removed and replaced.

AR001790

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d52-212x
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0221

Comment Submitted by Jacqueline Waring

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## Submitter Information

**Name:** Jacqueline Waring

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## General Comment

Please support President Trump's Immigration reform system. Our country and those immigrants that attempt to come to our country legally are being negatively affected by the illegal immigrants that are coming into our country illegally. Your support of Trump's reforms is critical.

AR001791

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d52-twvd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0222

Comment Submitted by Aaron Shore

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## Submitter Information

**Name:** Aaron Shore

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## General Comment

You need to support Trump's immigration reform.

AR001792

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d4w-oacc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0223

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I work for an NOG that strive to serve on our Border and walk alongside others in understanding the immigration process, specifically in the US. I have worked with migrants for at least 3 years and it has been a joy. Though our NGO is not directly related to the law side of immigration, we are directly related to the ways each migrant we work with is effected by changes in law. Especially changes like these, that would honestly effect, I truly believe all of America.

The proposal to remove the 30-day processing provision seems like a deterrent when it comes to asylum seekers, a way to ensure failure and an unsuccessful journey. Migrants are working alongside us in a huge capacity. When they reach our country, they want to work right away and help in any way possible. They dont come to the United States for vacation. They come because theyre fleeing very dangerous situations and very dire conditions. Some, we have caused as Americans. Our carelessness and complete disregard for our negative intervention in other countries and greed for power and materials has left other parts of our world in a state of disparity.

The 30 day process allows more time for agents and officers to process and vet properly and with enough time, and thoroughly. As opposed to us deciding when its most crucial to get rid of laws and processes that have been somewhat helpful, let us look at things that have not been helpful like the fairly recent, Migrant Protection Protocol or Remain in Mexico. As a resident in a border city, I have talked to several officers and agent that dont really understand MPP and what the point of it is. If we put more money into the services that need it the most, we would be able to have the man power to process and release timely and more organized, so that there isnt risk of bottleneck.

It seems as though no one in the Administration, government or government positions actually know whats going on... and therefore we should not remove the 30- Day Processing Provision for Asylum Applicant.

The asylum seekers I work with daily are excited to start their new lives, and safely! I know one that started working the week he arrived to his sponsor. There is a reason a judge ordered USCIS to comply with this rule...

AR001793



it is helpful in the cases of the asylum seekers. If they cannot work, they cannot provide and they will be seen as a drain on our society that will be on us Americans. Not on the asylum seeker.

Thank you for reading this.

AR001794

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d4r-ufk2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0224

Comment Submitted by Pierre Cajou

---

## Submitter Information

**Name:** pierre cajou

**Address:**

43 birch drive  
stanford, CT, 06902

**Email:** cpierrephilippe@yahoo.com

**Phone:** 2033097893

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## General Comment

I know that an asylum seeker (not those who abuse the asylum system like USCIS says often), has fled his country without any preparation that means that latter, like most of the asylum seekers, is facing serious difficulties to survive because of his financial situation in the US. And therefore, waiting here every day during the first six months to be granted asylum and at least an EAD, is very insurmountable.

And after all these faced difficulties, the USCIS think that those asylum seekers must keep on waiting more and more in such situations.

I even can understand USCIS directors and even President Trump because none of them ever survive as a refugee. And it is normal for them to not understand that someone in that situation can not wait more than six long months to be granted an EAD.

My proposition to USCIS to respond to the pressure it is facing with the EAD for asylum seeker and being able to grant quickly skilled employees an EAD, the bureau could allow the asylum seekers to apply for the EAD in the third month of their filled I-589 forms, and it grants them the EAD in the sixth month to have enough time to identify applicants who seek to exploit or abuse the asylum system without any prejudice for those who really fled political persecution in their home countries.

Or the USCIS makes sure, like it guarantees, to render effective the LIFO (Last In First Out) that means the bureau does not let pass over the 180 days without any decision regarding their case because even six months are already too long.

AR001795

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d4p-12hr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0225

Comment Submitted by Patrick Long

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## Submitter Information

**Name:** Patrick Long

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## General Comment

All EADs should be processed within 30 days, period. Asylum or no. This is a move in the wrong direction.

AR001796

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 04, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d4n-g9g0 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> API
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0226

Comment Submitted by Lisa Wilson, The Refugee Center

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## Submitter Information

**Name:** Lisa Wilson

**Address:**

201 W. Kenyon Rd., Suite 4D  
Champaign, IL, 61820-7892

**Email:** lisawilson@ecirmac.org

**Phone:** 217-344-8455

**Fax:** 217-239-0159

**Organization:** The Refugee Center

---

## General Comment

My name is Lisa Wilson, and I am the Executive Director of The Refugee Center in Champaign, IL. I oppose the proposed rule removing the 30 day processing provision for asylum applicants seeking employment authorization. This proposed rule is not only inhumane to the asylees, it will put a burden on communities that are committed to helping immigrants seeking asylum. Those seeking asylum should be allowed employment authorization while they are awaiting the disposition of their cases. The constant "rule-making" in the area of Immigration Law is just an attempt to subvert the democratic process. Immigrants, refugees and asylees work hard and contribute greatly to the U.S. economy. Depriving asylum seekers of a way to support themselves while they are awaiting a determination of their asylum application is not only cruel, it doesn't make any economic sense.

AR001797

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d4m-kihn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0227

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

First immigrants (asylum seekers) are criticized for being lazy? Then trying to steal jobs? (has anyone wondered, how they can do both of these things at the same time)? Let them work...or get busy doing the jobs they do. As a private citizen, I am compelled to push back on this Administration's crass and cruel administrative and executive rulings. Truly, history will not look kindly on these four years.

AR001798

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d4l-5h80
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0228

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

So much harm would come from delaying when an asylum seeker obtains their work authorization approval, not to mention it is in the interest of American tax dollars to not create this delay. The asylum seeker will suffer financially as a result of this delay, and that will then place the asylum seeker and their family in a place of food insecurity and at risk of homelessness. The asylum seeker will not be able to secure a valid ID (since a work permit and a social security number (SSN) are often necessary requirements to applications for a state ID) or to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify). The asylum seeker will be more vulnerable to exploitation and trafficking. And as for the asylum seekers mental well-being, this delay will increase feelings of fear, desperation, depression and overall low self-esteem and sadness. This is no way to help set up an asylum seeker's new life chapter in the USA. It would be shameful to contemplate doing away with the 30-day deadline. Please put yourself in the shoes of being an asylum seeker, do the right thing.

AR001799

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 04, 2019
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d4l-7zuf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0229

Comment Submitted by Elsie Guerrero, Advancing Latinas into Leadership Mentoring Program

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## Submitter Information

**Name:** Elsie Guerrero

**Organization:** Advancing Latinas into Leadership Mentoring Program

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## General Comment

See attached file(s)

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## Attachments

Advancing Latinas into Leadership Mentoring Program

AR001800

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue NW  
Mailstop #2140  
Washington, D.C. 20529-2140

DHS Docket No. USCIS-2018-0001  
84 F.R. 47148

November 4, 2019  
To Whom It May Concern:

I, Elsie Guerrero, Founder of Advancing Latinas into Leadership Mentoring Program respectfully submit this comment to the Department of Homeland Security's Notice of Proposed Rulemaking on Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

**Interest in the Proposed Rule:**

Advancing Latinas into Leadership Mentoring program is a non-profit in Washington, D.C. that helps high school Latinas with resources and tools they need to succeed professionally and academically. We help our students find jobs and apply for college. Many of our students have to work while in high school. This proposed rule would prevent students who are asylum seekers the opportunity to work while they are waiting for their court hearing.

**Department of Homeland Security Notice:**

On September 9, 2019, the Department of Homeland Security (DHS) published a [Notice of Proposed Rulemaking](#) ("the Rule") on Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, in the Federal Register at 84 F.R. 47148.

The Rule would remove the existing regulatory requirement that U.S. Citizenship and Immigration Services (USCIS) grant or deny an initial employment authorization application within 30 days of when the asylum seeker files the Form I-765, Application for Employment Authorization (EAD application). The Rule would also remove a provision requiring that an application for renewal be received by USCIS 90 days prior to expiration of the employment authorization.

Currently, asylum seekers whose asylum cases have been pending without a decision for at least 150 days are eligible to apply for an EAD (if the applicant has caused delays in their asylum case, they must wait longer). Pursuant to a regulation in place since 1994, USCIS is required to adjudicate the EAD application within 30 days of receiving it. Nonetheless, USCIS routinely failed to meet the deadline until July 2018, when a federal court hearing the case *Rosario v. USCIS*, No. C15-0813JLR (W.D. Wash), ordered the government to comply with the deadline. Since that time, USCIS has adjudicated 99% of initial EAD applications within 30



days. Prior to the court's ruling, USCIS adjudicated 47% of initial EAD applications within 30 days, an additional 31% of applications within 60 days, and 22% of applications in more than 60 days. One of the "chief purposes" of the 30-day deadline was "to ensure that bona fide asylees are eligible to obtain employment authorization as quickly as possible." (See p. 47153, fn. 11 of the Notice).

**[Comments]:**

I believe we should keep the rule as is and not make any changes to it. There is a saying that "if it not broken then why fix it?" Meaning, if the system is working just fine then why try to change it? I object to the new rule as it would affect many people who are making an honest living to take care of their families. Many of my students work after school and their parents work endlessly to make a living. With this new rule, it would prevent them from working. My students would also be impacted by it.

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-efjx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0230

Comment Submitted by Susan Wizer

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## Submitter Information

**Name:** Susan Wizer

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## General Comment

Please support sensible immigration reform.

AR001803

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-j35s
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0231

Comment Submitted by Alice Masters

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## Submitter Information

**Name:** Alice Masters

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## General Comment

;;;You need to support President Trump's Immigration reforms; get with it.

AR001804

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-det4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0232

Comment Submitted by Cecelia Gepp

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## Submitter Information

**Name:** Cecelia Gepp

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## General Comment

We are in dire need of immigration reforms and need the wall built and laws changed to protect our citizens.

AR001805

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-uiba
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0233

Comment Submitted by Troy Harding

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## Submitter Information

**Name:** Troy Harding

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## General Comment

Please get off your dead asses and allow our duly elected president to fix our screwed up immigration policies. That is what he said he was going to do if elected, and that is exactly why he was elected.

AR001806

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-7jsi <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0234

Comment Submitted by Michael Melillo

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## Submitter Information

**Name:** Michael Melillo

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## General Comment

30 days is NOT enough time to properly screen individuals asking asylum  
Ask the people doing the work what the proper time period should be

AR001807

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-ujcs <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0235

Comment Submitted by Ted Masters

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## Submitter Information

**Name:** TED MASTERS

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## General Comment

Please work with President Trump on this much needed imagination issue.

AR001808

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-xqxu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0236

Comment Submitted by Hector Rodriguez

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## Submitter Information

**Name:** Hector Rodriguez

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## General Comment

Defend America!

AR001809



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-pl6m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0237

Comment Submitted by Deborah DuPree

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## Submitter Information

**Name:** Deborah DuPree

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## General Comment

I am asking you, as a constituent, to please support President Trump's immigration reforms.

AR001810

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-fjcu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0238

Comment Submitted by Norman Chapman

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## Submitter Information

**Name:** Norman Chapman

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## General Comment

Stand with President Trump on immigration reform!

AR001811

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-x7n5 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0239

Comment Submitted by Kathy Rice

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## Submitter Information

**Name:** Kathy Rice

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## General Comment

I'm asking you to support President Trump's immigration reforms! There is a vital need in this country to secure our borders!

AR001812

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-4r3k <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0240

Comment Submitted by Maria Monch

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## Submitter Information

**Name:** maria monch

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## General Comment

I am in total support to president Trumps Immigration reforms

AR001813

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-trsa <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
---

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0241

Comment Submitted by Ron Sherman

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## Submitter Information

**Name:** Ron Sherman

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## General Comment

We must enforce the law. There is a purpose for them. Where does lawlessness end?

AR001814

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d54-460t
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0242

Comment Submitted by Ruth Howard

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## Submitter Information

**Name:** Ruth Howard

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## General Comment

I support President Trump's immigration reforms. These reforms have been needed for a very long time and without the necessary reforms, it is costing Americans millions.

AR001815

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d54-6vjb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0243

Comment Submitted by Lynne Latta

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## Submitter Information

**Name:** Lynne Latta

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## General Comment

No one can possibly screen immigrants in a month and no miss the criminals. Thats insane . Due process takes the time needed. Please allow appropriate time limits .

AR001816

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-aoir
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0244

Comment Submitted by William King

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## Submitter Information

**Name:** William King

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## General Comment

Thirty days is hardly long enough to screen the thousands of illegal immigrants that cross our open border. The rule of law must prevail, so a more realistic time frame for screening is necessary. Legal immigrants should not be penalized for their long path to citizenship. Illegals need to apply like legals. Support the rule of law and correct the process. Thank you.

AR001817



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-v6zi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0245

Comment Submitted by Robert Williams

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## Submitter Information

**Name:** Robert Williams

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## General Comment

The benefits of American citizenship are for CITIZENS. those who come legally fine. Those coming illegally are not entitle to benefits. Screen them out and send them back.

AR001818

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-lilo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0246

Comment Submitted by Richard Poole

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## Submitter Information

**Name:** Richard Poole

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## General Comment

Build the wall. Support our President. Stop stonewalling him. Bunch of worthless republican representatives. You all need to be replaced. Swamp cronies you all are. He's running this country. Not you. We elected HIM as our President. Do what he asks. You worthless nunch of self serving cowards.

AR001819

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-s9c2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0247

Comment Submitted by Laura Cohn

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## Submitter Information

**Name:** Laura cohn

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## General Comment

The democratic socialist party is ruining the country. Let president trump do his job without further interference

AR001820

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-k8s7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0248

Comment Submitted by Donna Liebel

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## Submitter Information

**Name:** Donna Liebel

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## General Comment

So very disappointed in your unwillingness to work with President Trump with so many of his requests. You are in your position to support WE THE PEOPLE but you are failing at every turn. Please support President Trumps immigration reform and show WE THE PEOPLE that you are there for us.

AR001821

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-2sem
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0249

Comment Submitted by Yevonne Mcc

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## Submitter Information

**Name:** Yevonne Mcc

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## General Comment

Get those Democ-RATS out and all these illegal. Also if were not born here you shouldn't hold office here.

AR001822

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-rmee
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0250

Comment Submitted by Yakov Dorsht

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## Submitter Information

**Name:** Yakov Dorsht

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## General Comment

I support our president!!!  
2 thumbs UP!

AR001823

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-5ecv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0251

Comment Submitted by Linda Hines

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## Submitter Information

**Name:** Linda Hines

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## General Comment

It should take however long to properly screen each & every asylum seeker. The US needs to protect it's citizens. My biggest fear is for the children and the country they will be living in if these changes are not put into place. If the democrats have a problem with this let them take them in.

AR001824

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-wduw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0252

Comment Submitted by John Gunn

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## Submitter Information

**Name:** JOHN GUNN

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## General Comment

Support President Trump's Immigration Reforms! The current system punishes people for coming here LEGALLY and weakens our national security.

AR001825



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-mle3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0253

Comment Submitted by Hoffard Normand

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## Submitter Information

**Name:** Hoffard Normand

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## General Comment

Just get the hell out of the workers way and allow them to do their job.

AR001826

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 05, 2019 <b>Tracking No.</b> 1k3-9d55-nd1v <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0254

Comment Submitted by Anna Quillman

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## Submitter Information

**Name:** Anna Quillman

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## General Comment

Support our President on enforcing our borders.

AR001827

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-g68g
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0255

Comment Submitted by Don Jones

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## Submitter Information

**Name:** Don Jones

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## General Comment

DO IT! Support President Trumps Immigration Reforms!  
Just DO IT!

AR001828

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-k6ke
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0256

Comment Submitted by Monica Sherman

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## Submitter Information

**Name:** Monica Sherman

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## General Comment

We must enforce the law. Laws are there to protect us. Where does lawlessness end?

AR001829

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 05, 2019
<b>Tracking No.</b> 1k3-9d55-ugrq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0257

Comment Submitted by Glenn Nelson

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## Submitter Information

**Name:** GLENN NELSON

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## General Comment

With what events have happened at our southern borders, sure makes a citizen take notice. How can a department provide a proper invite into this country when the large numbers of immigrants and migrants are basically invading our country? For a number of years there has been the amnesty for those that are life threatened. The result were that immigrants were coached to avoid the problems of getting into our country. This country requires the need for immigration reform. Congress will not move on getting this required move accomplished. I look forward that this department will provide rules and regulations that will be fair. However, to limit the number that are seeking asylum into this country. Thank you for your time and assistance.

AR001830

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-bpj8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0258

Comment Submitted by Joanne Mullins

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## Submitter Information

**Name:** Joanne Mullins

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## General Comment

Asylum seekers must be vetted and it takes a month to do so. Please support our national security by passing Pres. Trump's immigration reforms. Thank you for listening.

AR001831

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-3c9e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0259

Comment Submitted by Paul Michaelson

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## Submitter Information

**Name:** Paul Michaelson

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## General Comment

Please support immigration reform. Please put the security of our country above the insane democrat agenda by supporting President Trump's reforms.

AR001832

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-zvyq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0260

Comment Submitted by Dorothy Johnson

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## Submitter Information

**Name:** Dorothy Johnson

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## General Comment

We need to help and honor individuals who are honoring the laws of the USA.

AR001833



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-yj6x
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0261

Comment Submitted by Madeline Jones

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## Submitter Information

**Name:** Madeline Jones

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## General Comment

PLEASE SUPPORT PRESIDENT TRUMPS IMMIGRATION REFORM.WE ARE NOT INTERESTED IN IMPEACHMENT WE WANT YOU TO DO THE.WORK WE SENT YOU TO WASHINGTON TO DO.OUR MAIN CONCERN IS IMMIGRATION REFORM.OIUR SAFETY

AR001834

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-iiif
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0262

Comment Submitted by Joe Dickerson

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## Submitter Information

**Name:** Joe Dickerson

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## General Comment

I did not pay taxes during my life to have people coming to this country for a free ride on tax dollars. I'm a disabled veteran ASHAMED of the radical, almost terroristic attitudes of the liberal left. Do your job, and save what's left of America by not throwing tax dollars at the problem. Stop this circus. Save tax dollars for Americans who have worked hard and sacrificed even their lives, so they could one day retire.

AR001835

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5c-we6z <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0263

Comment Submitted by Jon Sumpter

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## Submitter Information

**Name:** Jon Sumpter

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## General Comment

Try doing the job you all were elected to do and protect the country we all live in!

AR001836

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-5u3l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0264

Comment Submitted by Gary Cox

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## Submitter Information

**Name:** Gary Cox

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## General Comment

Its time to quit talking and start doing. Support our president now with immigration reform.

AR001837

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5c-myby <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0265

Comment Submitted by Edward Olsen

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## Submitter Information

**Name:** Edward Olsen

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## General Comment

Mr. Official, I demand you support my Presidents views on immigration. Ed Olsen

AR001838

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-80se
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0266

Comment Submitted by Frank Greco

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## Submitter Information

**Name:** frank greco

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## General Comment

Its time all you in Washington start thinking about those people who were born here or are here legally, not those illegal people and gang members that you worry about more those that sent you to Washington on our behalf. You should all have Term Limits and stop becoming rich people at our expense or in favor of those that made you rich!!

AR001839

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5c-2geh <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0267

Comment Submitted by Elena Nunez

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## Submitter Information

**Name:** Elena Nunez

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## General Comment

I urge you to support President Trumps immigration reforms. Not doing so jeopardizes our national security.

AR001840

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-t2pd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0268

Comment Submitted by Jonathan Shaw

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## Submitter Information

**Name:** Jonathan Shaw

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## General Comment

It is insanity for anyone of any party to not support President Trumps immigration reforms. Do so. Do your jobs.

AR001841



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-gx6m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0269

Comment Submitted by Cleope Ressler

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## Submitter Information

**Name:** Cleope Ressler

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## General Comment

Please support Trumps immigration reforms, thank you for doing the RIGHT thing.

AR001842

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-x8fs
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0270

Comment Submitted by Kathy Gotter

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## Submitter Information

**Name:** Kathy Gotter

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## General Comment

Support immigration reform as President Trump has asked for.

AR001843

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-l6e3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0271

Comment Submitted by Bob Ressler

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## Submitter Information

**Name:** Bob Ressler

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## General Comment

Support Trumps immigration reforms this is extremely important to our country.

AR001844

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-jc1s
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0272

Comment Submitted by Bernice Lipkin

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## Submitter Information

**Name:** Bernice Lipkin

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## General Comment

It would be amusing if it weren't sickening that a Democratic-majority House hasn't done a significant piece of legislative work in years, yet gives the Trump administration 30 days to process all the illegals. Truly contemptible.

AR001845

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-r3b8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0273

Comment Submitted by Robert Osgood

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## Submitter Information

**Name:** Robert Osgood

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## General Comment

Mr Trump was elected on his immigration reform. The people of this country elected Mr Trump because he was the man for the job. If Congress and the Senate can't figure it out then put it to a vote by the people of this country that are most effected by the decision

AR001846

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-9p0b
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0274

Comment Submitted by Jeffrey Mohr

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## Submitter Information

**Name:** Jeffrey Mohr

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## General Comment

Please support President Trump's Immigration Reform agenda in all forms and press for enforcement of all currently existing immigration laws.

AR001847

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5c-pcpp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0275

Comment Submitted by Richard Wilson

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## Submitter Information

**Name:** Richard Wilson

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## General Comment

Fix the southern border, build the wall, send illegals home, send immigrant felons home. Immigrants should know English, be able to support themselves. Lower the immigration numbers, our infrastructure cannot hand the onslaught...

AR001848

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-tu7y
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0276

Comment Submitted by Gayle DeSantis

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## Submitter Information

**Name:** Gayle DeSantis

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## General Comment

USA cannot save the world!!!

Let them come legally. Do good background checks to make sure USA is not letting in criminals.

AR001849



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-cfoo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0277

Comment Submitted by Patty Richenberger

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## Submitter Information

**Name:** Patty Richenberger

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## General Comment

Support Trumps Immigration Reforms. Stop the insanity and make our country secure.

AR001850

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-mote <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0278

Comment Submitted by Jeanette Mitchell

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## Submitter Information

**Name:** Jeanette Mitchell

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## General Comment

Remove the 30 day screening time limit for asylum seekers. Do what is best for our country.

AR001851

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-a58q
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0279

Comment Submitted by Thomas Stella

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## Submitter Information

**Name:** thomas stella

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## General Comment

We need to support the Presidents immigration reform to protect our nation from terrorism and violent migrants looking to do harm

AR001852

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-373k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0280

Comment Submitted by Hugo Ortega

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## Submitter Information

**Name:** Hugo Ortega

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## General Comment

Where is the common sense regarding immigration. The laws are there for a reason. Allow the President to do his job and to protect our country by being more vigilant at our southern border.

AR001853

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-i392 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0281

Comment Submitted by Jodie Salley

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## Submitter Information

**Name:** Jodie Salley

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## General Comment

We support Trump. Best president in my lifetime.

AR001854

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-g805
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0282

Comment Submitted by HD Sumner

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## Submitter Information

**Name:** HD Sumner

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## General Comment

Veterans before refugees.

AR001855

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-s6m8 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0283

Comment Submitted by Dennis Brazil

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## Submitter Information

**Name:** Dennis Brazil

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## General Comment

Support our president!!!

AR001856

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-f7tr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0284

Comment Submitted by Deborah Clark

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## Submitter Information

**Name:** Deborah Clark

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## General Comment

These People need to be vetted and not just walk into Our Country and take jobs away from Americans. The money needed to set these people up while waiting for monies coming in means Welfare Benefits that should be going to Our Own People. We know this is a blatent way to get votes.

AR001857



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-6z9d
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0285

Comment Submitted by Kent Korver

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## Submitter Information

**Name:** Kent Korver

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## General Comment

Simple! STOP TOTALLY THE INFLUX OF ALL ILLRGALS AND MUSLIMS INTO OUR COUNTRY  
& "IMMEDIATELY"  
GET ALL OUT THAT ARE HERE NOW! ASAP NO DISCUSSION!

AR001858

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-pp15 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

## Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

## Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0286

Comment Submitted by Ruth Cole

## Submitter Information

**Name:** Ruth Cole

## General Comment

**TAKE ACTION: Support President Trumps Immigration Reforms NOW!**

Ruth - instead of working with President Trump to fix our broken immigration system, radical Leftists are fighting to protect the Beltways beloved status quo.

They don't care that the current system The current system punishes people for punishing people for coming here LEGALLY or that it weakens our national security. Work with President Trump to fix our broken immigration system,

Help President Trump and Ken Cuccinelli secure Americas safety by submitting a formal comment NOW!

AR001859

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-ncni
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0287

Comment Submitted by Denny Muller

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## Submitter Information

**Name:** Denny Muller

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## General Comment

Congress has become a Circus and is pissing off We The People! It's time to start working for US, YOUR BOSSES! We've had it with the whole lot of you and if you don't do what is RIGHT for AMERICA, you need to leave!

AR001860

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-wjr9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0288

Comment Submitted by William Pelletier

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## Submitter Information

**Name:** William pelletier

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## General Comment

We need Trumps immigration reforms we need to keep illegals out and only let in people that will work pay taxes and follow our laws and put a end to anchor babys now

AR001861

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-f9gn <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0289

Comment Submitted by KM Jack

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## Submitter Information

**Name:** KM Jack

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## General Comment

Support our President immigration reform!

AR001862

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-g5bp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0290

Comment Submitted by Richard Hanson

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## Submitter Information

**Name:** Richard Hanson

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## General Comment

I support the President's moves. The people want to know who is entering our country.

AR001863

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-wqff <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0291

Comment Submitted by William Sapp

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## Submitter Information

**Name:** william sapp

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## General Comment

please support pres Trumps immigration Reforms bills

AR001864

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-hlb0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0292

Comment Submitted by Marie Livingston

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## Submitter Information

**Name:** Marie Livingston

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## General Comment

It is childish for Adults to lie, seek revenge over a fair presidential election. The example that the Democrats present is dangerous to the up coming generations. Throwing around authority/power to dominate ppl is wrong. It is diabolically evil to the character of every Democrat to be seen as cowards.

AR001865



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-gc9u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0293

Comment Submitted by Crystal Manly

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## Submitter Information

**Name:** Crystal Manly

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## General Comment

You must support Immigration reform.

AR001866

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-9z6k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0294

Comment Submitted by Jonathan Cranor

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## Submitter Information

**Name:** Jonathan Cranor

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## General Comment

Stop illegal immigration. Send combat troops and get the job done. Thank You.

AR001867

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-y502
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0295

Comment Submitted by Susan Wiebe

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## Submitter Information

**Name:** susan wiebe

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## General Comment

please save america

AR001868

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-s8jd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0296

Comment Submitted by Nancy Hawkes

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## Submitter Information

**Name:** Nancy Hawkes

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## General Comment

We as American citizens are tired of these illegals You have been told by ICE what is coming into this country There are murderers drug dealers and the list goes on We are not going to carry these illegals financially or any other way This needs to stop!

AR001869

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-qug8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0297

Comment Submitted by George Foust

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## Submitter Information

**Name:** George Foust

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## General Comment

Protect our sovereignty and safety. Vet who wants to come in, confirm the paperwork on those who try.

AR001870

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-k9fr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0298

Comment Submitted by Rosalie Powelson

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## Submitter Information

**Name:** Rosalie Powelson

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## General Comment

Stop defending illegals and support our president. I am so tired of hearing that illegals have constitutional rights when they aren't even American citizens.

AR001871

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-m7t0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0299

Comment Submitted by Brian Insko

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## Submitter Information

**Name:** Brian Insko

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## General Comment

Support Immigration Reforms. Having Only 30 days to screen an asylum seeker is Not nearly enough. Increase it to 3 years. DEPORT everyone who is in our country Illegally. President Eisenhower did it, he rounded up 2 Million Illegals. We can do it again. Round up ALL Illegals and DEPORT them NOW.

AR001872

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-t02j <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0300

Comment Submitted by Roger Manchester

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## Submitter Information

**Name:** Roger Manchester

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## General Comment

REFORM IMMIGRATION LAWS NOW

AR001873



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-rg0m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0301

Comment Submitted by Ron Ritchey

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## Submitter Information

**Name:** Ron Ritchey

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## General Comment

By law, the Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit. Stop delaying and trying to change every law you don't agree with. Stop wasting my tax dollars on undoing and support the legal immigrates that are following the current laws to become citizens.

AR001874

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-j0jf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0302

Comment Submitted by Terri Shannon

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## Submitter Information

**Name:** terri shannon

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## General Comment

Our Nation needs to support President Trump's immigration reforms!!!

AR001875

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-48su
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0303

Comment Submitted by Nona M

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## Submitter Information

**Name:** NONA M

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## General Comment

This Country and the American People need protection from those who break the law! Immediately check into every immigrant who apply for citizenship or work permit!!

AR001876

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-zjve
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0304

Comment Submitted by Douglas Market

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## Submitter Information

**Name:** Douglas Market

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## General Comment

This is too bad that these elected officials have forgotten why they were elected too represent the people I call them the DUNBMOCRATS

AR001877

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-8rzw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0305

Comment Submitted by Marvin De Hart

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## Submitter Information

**Name:** Marvin De Hart

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## General Comment

get off your duffs and support the PRESIDENT.

AR001878

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-z1jq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0306

Comment Submitted by David Mobley

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## Submitter Information

**Name:** David Mobley

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## General Comment

Let's get with the program, and support the President (whom "We The People" had unanimously voted into office.

I'm sick and tired of the anti-patriotic attitudes most politicians have today. I support President Trump, and you'd do well if you did too!

I am asking you to "Support President Trump's Immigration Reforms!" It's high-time that the elected officials of America to start putting American citizens first!

AR001879

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-fbvu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0307

Comment Submitted by Kathryn Babcock

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## Submitter Information

**Name:** Kathryn BABCOCK

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## General Comment

The security of our entire way of life depends upon thoroughly checking the background of each and every person seeking asylum. Placing a time limit on such an investigation is insanity as no two investigations will be alike. Common sense must be put into practice.

AR001880

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-tpfz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0308

Comment Submitted by Chester Vidacovich

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## Submitter Information

**Name:** Chester Vidacovich

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## General Comment

If President Trump only has thirty days to process aliens we should shut our borders and take no one in. Let the good suffer for the bad instead of citizens suffering.

AR001881



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-m5a2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0309

Comment Submitted by Lee Durden

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## Submitter Information

**Name:** Lee Durden

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## General Comment

I support President Trump and his work with American Immigrants. This country grew & prospered with those who immigrated LEGALLY. Not illegals which are supported by the taxes I pay!

AR001882

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-e6gp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0310

Comment Submitted by Tom Craig

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## Submitter Information

**Name:** Tom Craig

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## General Comment

We want and support Trumps immigration reforms

AR001883

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-cn4w <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0311

Comment Submitted by Elvira OConnor

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## Submitter Information

**Name:** Elvira OCONNOR

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## General Comment

Its time to get behind the President on immigration any many of his other project. Please do so immediately

AR001884

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-2dbl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0312

Comment Submitted by Patrick Maulsby

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## Submitter Information

**Name:** Patrick Maulsby

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## General Comment

Thank you sir for what you have done for this country! If you had help, you might get more done!

AR001885

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-a4wi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0313

Comment Submitted by Eric Morton

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## Submitter Information

**Name:** Eric Morton

**Address:**

1300 Clay St., Ste. 600

Oakland, CA, 94612

**Email:** emorton@clearskylaw.com

**Phone:** 7607226582

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## General Comment

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

AR001886

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-1fpu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0314

Comment Submitted by William Holm

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## Submitter Information

**Name:** William Holm

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## General Comment

I am in favor of the careful screening of all immigrants seeking to enter our country. Our moral obligations as Christians or any other religious faith are to first protect our families and our communities. Therefore, lax immigration laws or their enforcement would by default seriously jeopardize the safety of our families and our communities. If American citizenship meant nothing, there wouldn't be any point to living here. For this reason, the integrity and high value of being an American citizen must be safeguarded.

AR001887

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-jz8l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0315

Comment Submitted by Jackie Henson

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## Submitter Information

**Name:** Jackie Henson

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## General Comment

It is irresponsible for the Democrats to put such a short time restraint on anyone doing background checks on ANYONE applying to come into this country, whether it be for a work visa, permanent citizenship, or what! It takes as long as it takes!!!!

AR001888

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-psud
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0316

Comment Submitted by Shelly Luna

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## Submitter Information

**Name:** Shelly Luna

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## General Comment

This is an opportunity of a lifetime to actually get the monumental work of the era done. To secure the nation for generations to come. We are looking to you and recording your action and voting accordingly. Get it done. Thank you so much for your consideration,

AR001889



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-7v44 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0317

Comment Submitted by Tyler Gaidzik

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## Submitter Information

**Name:** TYLER GAIDZIK

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## General Comment

Anyone who does not put America 1st needs to resign!

AR001890

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-72yy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0318

Comment Submitted by Ramon Mayor

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## Submitter Information

**Name:** Ramon Mayor

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## General Comment

Please Pass immigration law to protect the country National Security,control the influx of illegal alien,close loopholes in present immigration law.Bipartisan Congress must Pass this law.American Voters are watching you 24/7.

AR001891

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-dh6h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0319

Comment Submitted by Terry O'Neel

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## Submitter Information

**Name:** Terry O'Neel

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## General Comment

Support President Trumps immigration reform. Anything less is failing our great nation. 10yr Iran era vet.

AR001892

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-sgal <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0320

Comment Submitted by Phil Sparks

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## Submitter Information

**Name:** Phil Sparks

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## General Comment

Is it too much to ask to be logical, and reasonable concerning immigration laws? Please support President Trumps Immigration Reform Laws!

AR001893

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-c7iq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0321

Comment Submitted by Anthony Klimaytis

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## Submitter Information

**Name:** Anthony Klimaytis

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## General Comment

To all concerned, please support President Trump's immigration reforms. It is vital to the best interests of our great country.

AR001894

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-i8k4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0322

Comment Submitted by Lee Halverson

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## Submitter Information

**Name:** Lee Halverson

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## General Comment

Stick to the law. Support our President

AR001895

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-3lbr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0323

Comment Submitted by Diana Collins

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## Submitter Information

**Name:** Diana Collins

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## General Comment

Please support President Trump's Immigration reforms. It is way past time! We need to protect our country.

AR001896

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-94hw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0324

Comment Submitted by Ron Hubbard

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## Submitter Information

**Name:** Ron Hubbard

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## General Comment

Close our borders & make all immigrants follow the laws just as our ancestors had to do to get into the Dream Nation!!!

AR001897



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5b-khxz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0325

Comment Submitted by Elaine Bowen

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## Submitter Information

**Name:** Elaine Bowen

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## General Comment

Support President Trump reform immigration and build the wall.

Do the work for the American people you were elected by and for. Quit playing politics and get some work done. Or you won't be re-elected.

AR001898

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5b-ntf6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0326

Comment Submitted by Nancy Neal

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## Submitter Information

**Name:** Nancy Neal

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## General Comment

We need to follow our laws with regard to immigration and utilize E-Verify.

AR001899

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-dbg6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0327

Comment Submitted by Anne Hasa

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## Submitter Information

**Name:** Anne Hasa

**Address:**

2878 Coral Ct. #203

Coralville, 52241

**Email:** anneharrison915@gmail.com

**Phone:** 3194715023

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## General Comment

I do not agree with removing the 30 Day Processing provision for asylum applicants I-765. These people come to our country having been harmed in their home country. Even if the ultimate decision is a denial of asylum, and so long as the claim is not frivolous, they have a legitimate belief that they are deserving of an asylum grant and need to have the ability to work in the meantime while the decision is being made. It is not intelligent to believe that these people will not work, they will still work, but the US government will miss out on tax benefits as they will be paid under the table or with false names. The US government also lacks the resources to detect all those working under false premises, so it is asinine for this rule to be passed. It hurts the asylum seekers AND the American people. There are less taxed waged, people either are having to commit a crime to work to eat, or have to starve and rely on charitable organizations to hopefully house them and supply their needs as the US government does not wish to subsidize persons not lawfully permitted to be here. This is a serious catch-22. I understand the impact this has on limited public resources, but in the end the cost is greater to all to not have people working.

AR001900

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-z5ml
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0328

Comment Submitted by Jean Sutton

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## Submitter Information

**Name:** Jean Sutton

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## General Comment

I have been taught ever since I was a little girl that America is a Country of LAW. According to my concept of law, there is a PRINCIPLE that needs to be supported. It is only fair to those who abide by that principle that anyone coming into this Country is subject to our RULE OF LAW.

AR001901

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-bqyg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0329

Comment Submitted by Molly McKinney

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## Submitter Information

**Name:** Molly McKinney

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## General Comment

PLEASE RESPECT TAXPAYERS WHO ARE NOT AS RICH OR SAFE AS YOU, AND SUPPORT OUR HARDWORKING PRESIDENT WHO LOVES AMERICA WAY MORE THAN THE POLITICIANS DO! THANK YOU.

AR001902

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-94p1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0330

Comment Submitted by Patrick Sidener

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## Submitter Information

**Name:** Patrick Sidener

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## General Comment

Please support the President's reform plans for immigration.

Thank you for all that you do.

AR001903

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-ed4j <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0331

Comment Submitted by Randall Kessinger

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## Submitter Information

**Name:** Randall Kessinger

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## General Comment

Support TRUMP.....He is our only chance.

AR001904

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-63cx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0332

Comment Submitted by Peter Noone

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## Submitter Information

**Name:** Peter Noone

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## General Comment

President Trump's suggested changes to our immigration laws will enhance our laws significantly. Please join the President in this effort!

AR001905



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-hv68
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0333

Comment Submitted by Brenda Landers

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## Submitter Information

**Name:** Brenda Landers

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## General Comment

Please work with President Trump in a supportive way that will assure immigration reform and secure our borders.

AR001906

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-cqly
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0334

Comment Submitted by Phyllis Ingle

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## Submitter Information

**Name:** Phyllis Ingle

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## General Comment

Please stand with President Trump on the immigration reforms.

AR001907

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-v1gk <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0335

Comment Submitted by Vicky Long

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## Submitter Information

**Name:** Vicky Long

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## General Comment

Support President Trump's immigration reforms.  
Thank you.

AR001908

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-ib26
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0336

Comment Submitted by Emmanuel Koroma

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## Submitter Information

**Name:** Emmanuel Koroma

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## General Comment

This rule will make Asylum seekers become destitute and obliged to rely on humanitarian Assistance instead of working to be self reliant and contributing positively to the state. An indefinite waiting period will encourage antisocial or criminal activities with security implications.

AR001909

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-3a2z <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0337

Comment Submitted by Sharon Hall

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## Submitter Information

**Name:** SHARON Hall

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## General Comment

Work with our President and not against him on infrastructure, immigration. We are sick and tire of your Kangaroo court. Stop it now!!!

AR001910

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-yxcg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0338

Comment Submitted by Terry Largent

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## Submitter Information

**Name:** Terry Largent

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## General Comment

Please make every effort to make legal immigration more expedient and illegal immigration much harder to accomplish!

AR001911

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-4q6f <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0339

Comment Submitted by David Matthes

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## Submitter Information

**Name:** David Matthes

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## General Comment

Please support president Trump on securing our border

AR001912

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-ptv8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0340

Comment Submitted by Margaret Grosso

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## Submitter Information

**Name:** Margaret Grosso

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## General Comment

Please support President Trumps Immigration Reforms. Our nation is a nation of immigrants. All of whom waited to come here legally. We still welcome legal immigrants. We need to make sure only those who are legal get in and stay here as it had been for years.

AR001913



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-exe1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0341

Comment Submitted by Gordon Rohrbacker

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## Submitter Information

**Name:** Gordon Rohrbacker

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## General Comment

Being a blue collar worker from Texas . I have witnessed the damage done by unchecked immigration  
Please do whatever it takes to fix this

AR001914

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-jdsp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0342

Comment Submitted by Roberta Bono

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## Submitter Information

**Name:** Roberta Bono

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## General Comment

Please support the new Immigration Reform. It's vital for our country. I pray you will consider this

AR001915

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-st31 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0343

Comment Submitted by Shirley Linnen

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## Submitter Information

**Name:** Shirley Linnen

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## General Comment

Please support President Trump on immigration reform.  
Let's get this settled and move on to other things.

AR001916

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-lnb8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0344

Comment Submitted by John Allen

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## Submitter Information

**Name:** John Allen

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## General Comment

Please go with the President's reforms.  
What we have doesn't work.

AR001917

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-d3vb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0345

Comment Submitted by Nancy Garcia

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## Submitter Information

**Name:** Nancy Garcia

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## General Comment

I support President Trump's Immigration reforms!! The illegals have been here way too long jeopardizing American citizens way too long and taking our Tax money!!

AR001918

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-w14a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0346

Comment Submitted by Laura Patrick

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## Submitter Information

**Name:** Laura Patrick

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## General Comment

President Trumps only great achievement has been his immigration policies!!! So please help President Trump to continue these policies.

AR001919

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-oic5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0347

Comment Submitted by Jim Davis

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## Submitter Information

**Name:** Jim Davis

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## General Comment

Please support the President in his effort(s) ALL his efforts in securing the Southern boarder

AR001920

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-6n0b
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0348

Comment Submitted by Kathryn Eastman

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## Submitter Information

**Name:** Kathryn Eastman

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## General Comment

It is past time to stop this waste of time. The democratic party needs to be held accountable for the lack of work and doped for the amount of time they wasted on this witch hunt. Enough is enough and Pelosi and Schumer need to be thrown out of Congress.

AR001921



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-41p3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0349

Comment Submitted by Nina Lamb

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## Submitter Information

**Name:** Nina Lamb

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## General Comment

Please support President Trumps immigration reforms! We must protect our country and not allow anyone in or to stay unless we can verify who they are and why they have come.

AR001922

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-oksf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0350

Comment Submitted by Lynda Wilson

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## Submitter Information

**Name:** Lynda Wilson

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## General Comment

Start supporting President Trump's efforts to control immigration and reform these rules! I intend to vote against each of you that oppose the President in trying to make sense of our world again!

AR001923

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-27lx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0351

Comment Submitted by John hovis

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## Submitter Information

**Name:** John hovis

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## General Comment

I would thing you screen who comes into your house why not your nation. We have got enough poor people that need help living here already. Why would you want to make it worse.

AR001924

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-z3sm <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0352

Comment Submitted by Jensen Houston

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## Submitter Information

**Name:** Jensen Houston

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## General Comment

Support President Trump's immigration reforms! We need strong borders

AR001925

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-u3xh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0353

Comment Submitted by Rebecca Voytek

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## Submitter Information

**Name:** Rebecca Voytek

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## General Comment

I am urging you to support President Trumps common sense immigration reforms.

AR001926

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-lhjo <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0354

Comment Submitted by Nikita Skorohodo

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## Submitter Information

**Name:** Nikita Skorohodo

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## General Comment

Support Donald j trump 100% with his imagination reform

AR001927

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-728f
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0355

Comment Submitted by Mark Huffman

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## Submitter Information

**Name:** Mark Huffman

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## General Comment

Its about time our govn gets to work, instead of playing with your vajaja. We the people need to fire the whole lot of you fucktards. The people are over the bullshit. Just remember when us people come to DC. Your games will be over for good

AR001928

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-ywa8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0356

Comment Submitted by Vickie Christensen

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## Submitter Information

**Name:** Vickie Christensen

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## General Comment

Please help President Trump secure our Southern Border to help protect the Citizens that live here legally. Help keep the drugs out as well.  
We do NOT deserve being harmed by the many immigrants who are here illegally and harm, Rob, or murder our Citizens.

AR001929



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-qb3v <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0357

Comment Submitted by Barbara Santorini

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## Submitter Information

**Name:** Barbara santorini

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## General Comment

Support the president on the wall, immigration reforms . Do the right thing

AR001930

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-atpr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0358

Comment Submitted by Waunita Moon

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## Submitter Information

**Name:** Waunita Moon

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## General Comment

Send more judges to the boarder to help with this backlog!!! Stop the illegal immigration!!!

AR001931

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-wb58
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0359

Comment Submitted by Ron Bieber

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## Submitter Information

**Name:** Ron Bieber

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## General Comment

We must protect our borders and control who enters our country!

AR001932

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-zcmo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0360

Comment Submitted by G K

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## Submitter Information

**Name:** G K

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## General Comment

The Left is supporting a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline. This has to change and it must change NOW!

Support President Trump's Immigration Reforms to secure our borders.

AR001933

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-h0kr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0361

Comment Submitted by Todd Hilliard

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## Submitter Information

**Name:** Todd Hilliard

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## General Comment

By law, the Trump Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

Do your job and help President Trump with our immigration crisis and protect those immigrants following the law as they should!

Proper background checks must be done and the illegal "criminal" immigrants must be deported!

AR001934

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-lc33 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0362

Comment Submitted by David Gaskill

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## Submitter Information

**Name:** David Gaskill

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## General Comment

Please dispense with arbitrary time limits and allow full vetting of potential immigrants so that legal immigrants are not punished because of the volume of human traffickers posing as parents and illegally crossing into the US. Trying to make Ken Cucchinelli & POTUS embarrassed is not worth this tragedy!

AR001935

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-yxq1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0363

Comment Submitted by Vernon Davis

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## Submitter Information

**Name:** Vernon Davis

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## General Comment

Haven't you figured out yet that President Trump loves this country and will do his best for it. Get out of the way!

AR001936

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5a-b1g1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0364

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The 30 day rule should stay in effect.

Asylum seekers are hardworking people who sought out our government to help them in their time of need.

If there is no deadline for the agency, asylum seekers can wallow in poverty especially with the inability to work.

This will unleash an unfortunate cycle in the economy, whereby people cannot afford to provide even the basic needs, food, shelter and clothing to their families.

Their applications could possibly be bottle-necked in an indefinite bureaucratic backlog.

I am an immigrant that has contributed directly or indirectly billions of dollars into the system with my intellectual capacity on financial transactions. I was thankful that my application was processed in a timely manner and I had my work authorization even though my status was conditional.

I kindly ask you afford these asylum seekers the same liberties.

God bless America.

AR001937



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5a-wz4w <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0365

Comment Submitted by Peggy Plumlee

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## Submitter Information

**Name:** Peggy Plumlee

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## General Comment

Please support President Trumps Immigration Reforms,  
Thank you. LORD, God, please support all those that support You, LORD and the President in these United States. I ask them to honor their oath of Office to You, and to this country.  
Please protect this Great Country known as America. These United States.

AR001938

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-z1z8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0366

Comment Submitted by Ronald Ginochio

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## Submitter Information

**Name:** Ronald Ginochio

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## General Comment

Please support President Trump's proposed immigration reforms. They are necessary to the viability of our country and are long overdue.

AR001939

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-kgcp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0367

Comment Submitted by William Dodd

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## Submitter Information

**Name:** William Dodd

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## General Comment

Please support President Trump's Immigration reform ! It is the right thing to do and the right thing for America !  
This is what most Americans want !!

AR001940

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-qa6l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0368

Comment Submitted by Kenneth Musetti

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## Submitter Information

**Name:** Kenneth Musetti

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## General Comment

I believe that President Trump is doing the right thing and only allowing the immigrants to come into our country the legal way and keep all the illegal immigrants and refugees from entering our great country An I am behind President Trump 100% he is handling the situation the way it should be handle and the democrats should get on board and quit trying to Stop President Trump he represents the Citizens of the USA not the illegal immigrants and refugees period

AR001941

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-2d18
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0369

Comment Submitted by Donna Kramer

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## Submitter Information

**Name:** Donna Kramer

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## General Comment

STOP BLOCKING such needed immigration reforms. The problem continues to get worse. Let's solve this problem together for our nation.

AR001942

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-lsub
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0370

Comment Submitted by Susanna Ferry

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## Submitter Information

**Name:** Susanna Ferry

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## General Comment

No country remains a sovereign nation without secure borders. Legal immigration should be the rule. Illegal immigration should be stopped in its tracks. organizers of the various "caravans" should be jailed.

AR001943

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-uzpm <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0371

Comment Submitted by Jukka Halonen

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## Submitter Information

**Name:** jukka halonen

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## General Comment

God bless President Trumps Immigration Reforms!

AR001944

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-opew
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0372

Comment Submitted by Betty Henry

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## Submitter Information

**Name:** Betty Henry

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## General Comment

We are asking that you support President Trump's Immigration Reforms now. The illegals must go through proper channels to become legal citizens just like the others who are now legal law-abiding citizens.

AR001945



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-7n2f
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0373

Comment Submitted by Anonymous Former EOIR Employee

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## Submitter Information

**Name:** Anonymous Former EOIR Employee

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## General Comment

It is obvious that the intent with this suggested change is to deprive the Asylum seeker of the opportunity to hire an Immigration attorney.

AR001946

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-tpc9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0374

Comment Submitted by Claudia Hunter

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## Submitter Information

**Name:** CLAUDIA HUNTER

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## General Comment

Please support President Trump's Immigration Reforms. Without border controls and immigration rules enforced, we have no country.

AR001947

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-d0gn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0375

Comment Submitted by David Bliven

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## Submitter Information

**Name:** David Bliven

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## General Comment

As a Representative of the People, you need to stop all of your insanity. Start working to safe guard the United States of America by securing the Border. Then stop allowing Illegal Aliens from receiving unearned benefits. Focus on reducing the National Debt and securing Social Security.

AR001948

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-9jbe
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0376

Comment Submitted by Phillip Anderson

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## Submitter Information

**Name:** Phillip Anderson

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## General Comment

It is is time that we limit immigration to legal immigrants who respect us enough to follow our laws. The asylum program is a joke and is simply abused by millions of illegal aliens to invade our country, and it needs to stop.

AR001949

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-1kp7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0377

Comment Submitted by Michael Kennedy

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## Submitter Information

**Name:** Michael Kennedy

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## General Comment

I would like you to support our President's immigration reforms. It's extremely important matter to myself and my family and community. Thank you

AR001950

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-a3r7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0378

Comment Submitted by Nathan Voldman

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## Submitter Information

**Name:** nathan voldman

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## General Comment

I support all immigration reforms by my president

AR001951

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-gtnt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0379

Comment Submitted by Elaine Boyle

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## Submitter Information

**Name:** Elaine Boyle

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## General Comment

No one should be able to come to the US illegally!

AR001952

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-febu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0380

Comment Submitted by Anita Chariw

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## Submitter Information

**Name:** Anita Chariw

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## General Comment

Stop the insanity and get to work, Democrats!!! I fully support the Presidents agenda.

AR001953



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-3qhp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0381

Comment Submitted by Amado Puentes

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## Submitter Information

**Name:** Amado Puentes

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## General Comment

Support the Immigration Reforms submitted by President Trump.

AR001954

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-4mlt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0382

Comment Submitted by Dianne Ulmen

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## Submitter Information

**Name:** Dianne Ulmen

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## General Comment

Please stop the politics and do what's right for America and the American people.  
We love our president and appreciate all he has accomplished for our country and the citizens.

AR001955

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-y45o <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0383

Comment Submitted by Robert Prickett

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## Submitter Information

**Name:** Robert Prickett

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## General Comment

We do need to secure our borders better than they are at this time

AR001956

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-9iqv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0384

Comment Submitted by Barbara Lyle

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## Submitter Information

**Name:** Barbara Lyle

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## General Comment

Must apply for citizenship

AR001957

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-85y9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0385

Comment Submitted by Sheila Franklin

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## Submitter Information

**Name:** Sheila Franklin

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## General Comment

Please support President Trumps immigration reforms, and allow more time to evaluate those seeking asylum. A better, more thorough system, will benefit this country.

AR001958

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-1rpu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0386

Comment Submitted by W Johnson

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## Submitter Information

**Name:** W Johnson

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## General Comment

I strongly support the President's position on immigration policy.

AR001959

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-mwnh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0387

Comment Submitted by Jimmy Harris

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## Submitter Information

**Name:** Jimmy Harris

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## General Comment

Immigration needs fixed now

AR001960

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-4z97
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0388

Comment Submitted by Donald Severance

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## Submitter Information

**Name:** Donald Severance

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## General Comment

I am in favor of people coming to United States for work and eventual citizenship, but there should not be a short time to accomplish this situation. We should make sure immigrants are trustworthy. We do not want illegal drug dealers, or any other type of criminal entering our country!

AR001961



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-89fv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0389

Comment Submitted by George Guntermann

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## Submitter Information

**Name:** George Guntermann

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## General Comment

Here in AZ illegal immigration is rampant. Crime is out of control. The role of governments is to protect and serve 'citizens' first. I will be voting against any candidate that cannot prove they take this role seriously!

AR001962

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-b983
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0390

Comment Submitted by Carol Davenport

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## Submitter Information

**Name:** Carol Davenport

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## General Comment

I am sick in tired of all this crap with impeachment! How dare the Republicans party have allowed this to Happen! Where is your backbone. Who is fighting for we the people! Remember I have a wonderful memory!! I will never vote for someone who won't fight for me.

AR001963

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-dvi3 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0391

Comment Submitted by Katherine Williams

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## Submitter Information

**Name:** Katherine Williams

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## General Comment

I am requesting that you support Pres. Trump's immigration reforms.

AR001964

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-acg8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0392

Comment Submitted by Ernest Dieterle

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## Submitter Information

**Name:** ERNEST DIETERLE

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## General Comment

Tell Washington to Support President Trump's Immigration Reforms!

AR001965

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-zvsx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0393

Comment Submitted by Barbara Roberts

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## Submitter Information

**Name:** Barbara Roberts

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## General Comment

It's not being prejudice or racist to want our country safe. Please support our President in the ongoing efforts he makes trying to secure our country. Thank you!

AR001966

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-v19e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0394

Comment Submitted by Leo Fisher

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## Submitter Information

**Name:** LEO FISHER

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## General Comment

WE NEED TOO RESTORE OUR PEOPLES SAFETY FROM THE CRIMINALS THAT ARE ALREADY HERE AND THE ONES COMING. FAIR AND LEGAL IMMIGRATION IS HOW MY GRANDPARENTS GOT HERE

AR001967

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-knb0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0395

Comment Submitted by Pamela Finch

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## Submitter Information

**Name:** Pamela Finch

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## General Comment

I am for and would like you also to support President Trump's Immigration Reforms.  
Thank you.

AR001968

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-52io
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0396

Comment Submitted by Rita Bruton

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## Submitter Information

**Name:** Rita Bruton

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## General Comment

Please help do something about our immigration rules that are not being followed or enforced. The people encouraging the problems should be fined or arrested.

AR001969



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-lh9w <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0397

Comment Submitted by Nun Yurbyznes

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## Submitter Information

**Name:** Nun Yurbyznes

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## General Comment

Implement Pres. Trumps immigration reforms now!

AR001970

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-phk2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0398

Comment Submitted by Mark Frazier

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## Submitter Information

**Name:** Mark Frazier

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## General Comment

Build the BORDER WALL, it's past time to get this done, to much open territory is over working our BORDER PATROL agents and is eating up a lot of money wastefully

AR001971

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-1s4a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0399

Comment Submitted by Robert Beisel

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## Submitter Information

**Name:** Robert Beisel

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## General Comment

Support President Trumps Immigration Reforms !! I voted for Trump to keep bad people out of our country and to open the door wider for good people to come into the USA. All illegal aliens do not respect our countrys laws. If you dont support President Trump, then I cant support you !!

AR001972

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-dvf2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0400

Comment Submitted by Dawit Ghebremichael

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## Submitter Information

**Name:** Dawit Ghebremichael

**Address:**

New York, NY,

**Email:** dazmera@gmail.com

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## General Comment

Asylum applicants mostly arrive in US escaping a brutal persecution in their homeland.

While it is a huge relief to arrive in US - land of freedom and opportunity- it would equally be stressful if one is made dependent because of delay in having work permit. Or may be forced to look for black work which is underpaying and abusive. The asylum seeker may even develop a negative outlook on the country itself and it basically kill aspirations and potential of growth for individuals.

The first few months in US are key and decisive in determining your fate in the country. It would be good to provide work permit as soon is possible and integrate them into the workforce and the society.

Besides, most asylum seekers left behind their family in a precarious situation. Their families mostly are dependent on them for their basic needs. It is humanitarian to help them help themselves and their families by just allowing them to work as soon possible.

I myself was once asylum seeker . My EAD was delayed during renewal and my employer terminate me . Even if i applied for renewal 90 days ahead of the expiration day of the EAD, it didnt help. I paid more than \$300 for renewal. But the EAD arrived 2 weeks after my termination. I lost my job and a good opportunity for growth and benefits. I had to start new. Why is it necessary to expose those who flee persecution to another round of harassment?

AR001973

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-pkoy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0401

Comment Submitted by Robert Scaletti

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## Submitter Information

**Name:** Robert Scaletti

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## General Comment

Please rid the time consuming rules that take manpower away from those who are legally attempting to get into the United States. Legal applicants should have preference over all other applicants seeking a better life in America. Thank you for your consideration.

AR001974

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-ii33
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0402

Comment Submitted by Carrie Brasser

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## Submitter Information

**Name:** Carrie Brasser

**Address:**

1708 Irving Ave S.

Minneapolis, MN, 55403

**Email:** carriebrasser@gmail.com

**Phone:** 612-315-2299

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## General Comment

This proposed rule, especially the portion seeking to eliminate the 30-day processing timeframe, is insane. Asylum seekers come here often with nothing, and finding employment is vital to their survival and self-sufficiency. It seems opponents of the asylum process often complain that asylum seekers are coming here to leech off of our system - to the contrary, they wish to work and support themselves, and eliminating the 30-day processing provision - with no limit on how long the government may take before granting an application - prevents these people from working, supporting themselves, and giving back to the U.S. economy. Not only is this new proposed rule cruel, it is counter-productive, inefficient, and dangerous to the U.S. economy. I strongly urge DHS NOT to eliminate the 30-day processing timeline. It is vital to both the well-being of these immigrants, AND the American economy.

AR001975

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-u81t
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0403

Comment Submitted by John Higgins

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## Submitter Information

**Name:** John Higgins

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## General Comment

You must Support our Presidents Immigration reform without further delay or excuse. Its time Washington politicians do their job!

AR001976

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-7ebz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0404

Comment Submitted by Sherry Cano

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## Submitter Information

**Name:** Sherry Cano

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## General Comment

I totally support the president we need to get immigration solved. No more basement meetings lets get to the business of running the country instead of hating on the president!

AR001977



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-fcdv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0405

Comment Submitted by Ronald Wilkinson

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## Submitter Information

**Name:** Ronald Wilkinson

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## General Comment

Mr president you have done a fantastic job on everything. It's to bad the politicians can't see the light of day. The people cry babies don't care about their constituents and only about their LITTLE petty feelings. We are not laughing at them but at them.

AR001978

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-9vcw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0406

Comment Submitted by Ed Willers

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## Submitter Information

**Name:** Ed Willers

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## General Comment

Stop the political games. Give President Trump what he needs to reform our broken immigration system.

AR001979

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-78fp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0407

Comment Submitted by Renee Newman

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## Submitter Information

**Name:** Renee Newman

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## General Comment

It is beyond crazy that we should have to rush through immigrants. We pay taxes and expect to be protected from people who expect us to give them everything we have worked hard for. They're just going to have to wait until we can get to them. It is worth the wait unless you are just coming to take advantage of us.

AR001980

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-cyog
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0408

Comment Submitted by Elisabeth Long

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## Submitter Information

**Name:** Elisabeth Long

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## General Comment

Please support President Trump on immigration reform. I came to the USA legally and so should everyone else. No free pass if born here and parents came here illegal. They need to go through all that my family did. I love living here and am a proud citizen of this country and a supporter of President Trump.

AR001981

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-goer <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0409

Comment Submitted by Ramona Grooms

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## Submitter Information

**Name:** Ramona Grooms

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## General Comment

Nothing good comes from snap judgements. To do things right one has to take the time to do it right. Set things up to be fair for those who really want to become citizens and help them by giving them that time.

AR001982

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-ry0q <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0410

Comment Submitted by Jeannette Wittkower

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## Submitter Information

**Name:** Jeannette Wittkower

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## General Comment

SUPPORT IMMIGRATION REFORMS!

AR001983

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-m3sj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0411

Comment Submitted by Marissa Gardner

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## Submitter Information

**Name:** Marissa Gardner

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## General Comment

As my representative in Washington, I expect you to represent my values.

Support President Trumps immigration reform. It is the right thing to do. It is the conservative thing to do.

Also, if you need a refresher course and what it means to be a conservative try reading the Utah Republican platform. Its available online for your convenience.

AR001984

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-frfo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0412

Comment Submitted by Kay Marvin

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## Submitter Information

**Name:** Kay Marvin

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## General Comment

We hired you to do a job...now stand up like men and not mice to represent the Good People in America!  
We need the Illegals to stay in their own country and help make it good

AR001985



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-w2e5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0413

Comment Submitted by Gerald Romano

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## Submitter Information

**Name:** Gerald Romano

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## General Comment

Just do it.

AR001986

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-6aty <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0414

Comment Submitted by Karen Jochim

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## Submitter Information

**Name:** Karen Jochim

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## General Comment

For our country to remain a democratic republic, it is necessary to control our borders and our budget. Without immigration reforms, this will not be possible and our country will continue to be infested my too many people who are terrorists and/or criminals. To get an understanding of the extent of this, a study or analysis of Europes circumstances shows how this uncontrolled situation gets dangerous for the average citizen

AR001987

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-nuek <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0415

Comment Submitted by David Young

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## Submitter Information

**Name:** David Young

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## General Comment

Support immigration policy

AR001988

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-gjho
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0416

Comment Submitted by Gale Foret

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## Submitter Information

**Name:** Gale Foret

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## General Comment

Please support the President's immigration reform. Our country's resources are being drained by law breakers leaving nothing for the elderly, veterans and the poor. Total misuse of taxes without permission.

AR001989

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-jzbw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0417

Comment Submitted by Ralph Valentine

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## Submitter Information

**Name:** ralph valentine

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## General Comment

U.S. citizens come first, not the other way around. All the Dems. want is more Dems.

AR001990

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-bncs
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0418

Comment Submitted by Louis Griffin

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## Submitter Information

**Name:** Louis Griffin

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## General Comment

Please stop jeopardizing American lives. Reform our immigration laws or let the President do it if you will not do the job you were elected for.

AR001991

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-dqj3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0419

Comment Submitted by John Fuller

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## Submitter Information

**Name:** John Fuller

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## General Comment

I support President Trumps immigration reform efforts. I respectfully urge you to pass these reforms.

AR001992

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-bn6l <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0420

Comment Submitted by Brandon Bunch

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## Submitter Information

**Name:** Brandon Bunch

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## General Comment

Fix immigration system

AR001993



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-363k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0421

Comment Submitted by Cheryl Reynolds

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## Submitter Information

**Name:** Cheryl Reynolds

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## General Comment

As a citizen of the UnitedStates of America I support President Trumps immigration reforms 100%. I respectfully request that You get behind President Trump to resolve the issues that are unrealistic...

AR001994

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-o2qo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0422

Comment Submitted by Clifford Barnes

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## Submitter Information

**Name:** Clifford Barnes

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## General Comment

Support immigration the way President Trump has laid out the process

AR001995

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-o6m2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0423

Comment Submitted by Judy Settles

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## Submitter Information

**Name:** Judy Settles

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## General Comment

Trump has been being impeached ever since elected. Get to work for taxpayers or resign!!

AR001996

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-3b2v
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0424

Comment Submitted by Carole Stubbe

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## Submitter Information

**Name:** Carole Stubbe

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## General Comment

We must strengthen our Immigration laws and policies for the protection and security of our great nation. Please support President Trumps Immigration Reforms for the benefit of all American citizens. Thank you.

AR001997

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-c79i <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0425

Comment Submitted by Celeste lewis

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## Submitter Information

**Name:** Celeste lewis

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## General Comment

Please support our great president!

AR001998

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-qe3y
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0426

Comment Submitted by RONALD BATESOLE

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## Submitter Information

**Name:** RONALD BATESOLE

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## General Comment

Please help President Trump and Ken Cuccinelli improve the immigration program. Cooperation is necessary to increase the safety of our country.

AR001999

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d59-njw1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0427

Comment Submitted by Robert Courter

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## Submitter Information

**Name:** Robert Courter

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## General Comment

Immigration Reform NOW!! Do your sworn duty.

AR002000

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-8yo7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0428

Comment Submitted by Harold Bixler

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## Submitter Information

**Name:** Harold Bixler

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## General Comment

Get this done now. The people on the Left are giving this country away.

AR002001



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-que9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0429

Comment Submitted by Sandra Nickerson

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## Submitter Information

**Name:** Sandra Nickerson

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## General Comment

We should welcome those who come here legally but not allow illegal entry. If a person enters illegally they're already proving their disregard for the law. Those who enable them are also disregarding law because they're accomplices to the illegal action.

AR002002

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-1xnd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0430

Comment Submitted by Melissa Fieleke

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## Submitter Information

**Name:** Melissa Fieleke

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## General Comment

I support President Trump and what hes doing, for the American People.

AR002003

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d59-q6no
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0431

Comment Submitted by Evan Gerber

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## Submitter Information

**Name:** Evan Gerber

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## General Comment

Please support President Trump's immigration reform. It is long past do and needs immediate attention.

AR002004

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-83oj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0432

Comment Submitted by Ann Samuelson

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## Submitter Information

**Name:** Ann Samuelson

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## General Comment

Plse enact immigration change and secure our borders. Enable our President to continue his agenda to restrict illegal entry of our country by cartels, terrorists

AR002005

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-8wfg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0433

Comment Submitted by Alexander Vainstein

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## Submitter Information

**Name:** Alexander Vainstein

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## General Comment

Please remove these bureaucratic laws that allows bad bureaucrats to cut corners and limit resources on making immigrants that want to come to our great nation legally.

AR002006

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-24zm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0434

Comment Submitted by Benny Tranbarger

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## Submitter Information

**Name:** Benny Tranbarger

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## General Comment

America must get behind the president on immigration reform , those Dems only want to get Votes by allowing the illegals into America and giving them places to live and money which they never paid into our system, The Dem. party is evil and sick people.

AR002007

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-7o5m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0435

Comment Submitted by Robert von Behr

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## Submitter Information

**Name:** Robert von Behr

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## General Comment

We in our home support President Trumps actions to regularize and rationalize immigration. America is our home; we have to protect it.

AR002008

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-wa2u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0436

Comment Submitted by Isabel Thruston

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## Submitter Information

**Name:** Isabel Thruston

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## General Comment

I agree with President Trump's Immigration Reforms and it is only fair that We the People can give our opinion on all that he prepossess. I can say President Trump is the only President that has done good if not better than the rest.

AR002009



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d58-72kj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0437

Comment Submitted by Tony Smith

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## Submitter Information

**Name:** Tony Smith

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## General Comment

Support immigration Now!!

AR002010

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-l3g1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0438

Comment Submitted by Larry Covino

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## Submitter Information

**Name:** Larry Covino

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## General Comment

I am requesting that you support President Trump and the proposed immigration reform. This lack of action has been going on for too long.  
Your immediate action is needed.

AR002011

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-yv0w
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0439

Comment Submitted by Bob Gillaspie

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## Submitter Information

**Name:** Bob Gillaspie

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## General Comment

Please support and pass President Trumps immigration reforms.

AR002012

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-lfq6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0440

Comment Submitted by John Hackett

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## Submitter Information

**Name:** John Hackett

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## General Comment

support president trump's immigration reforms now for GOD and America

AR002013

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-vm16
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0441

Comment Submitted by Phillip Clayton

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## Submitter Information

**Name:** Phillip Clayton

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## General Comment

Please Stop The immigration seekers for a work permit. It should take longer than 30 days to approve these people. They need to be vetted more. With the islamic people coming thru the southern boarder. It should be up to 1yr process. The American people should be put first! The people crossing the borders should be able to take care of their self as far as food housing etc. But they need to be vetted properly! And that takes longer than 30 days And that takes longer than 30 days!

AR002014

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-u8pq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0442

Comment Submitted by Joseph DeLuna

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## Submitter Information

**Name:** Joseph DeLuna

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## General Comment

We The People Have Spoken In The Election Of President Trump And Want The Laws On Illegal Immigration And The Other Immigration Laws That Are Not In The Best Interests Of The American Citizens Repealed! Build The Wall!

AR002015

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-35e8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0443

Comment Submitted by Raymond Kafka

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## Submitter Information

**Name:** Raymond Kafka

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## General Comment

Why is it you have denied me my driving privileges, illegally, time and again, and then let every foreign national on planet drive on OUR streets?

Who do I contact at the federal level to help with criminally prosecuting those at the state level?

Do you even know?

Would I have to threaten to kill the President for you to even care?

Let me know.

stitch1ray@aol.com

AR002016

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-uxz1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0444

Comment Submitted by Betty Baker

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## Submitter Information

**Name:** Betty Baker

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## General Comment

We, the American people are who you represent, not illegal immigrants. We want you to do your job and support President Trump's immigration policies. If you can't do that, then we can't vote for you next year.

AR002017



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-bvr3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0445

Comment Submitted by James Lander

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## Submitter Information

**Name:** James Lander

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## General Comment

Arbitrarily setting a time limit for the vetting of asylum seekers into our country is insane. Stop trying to let unvetted persons into our nation.

AR002018

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-pz4b
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0446

Comment Submitted by Glenn Davis

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## Submitter Information

**Name:** glenn davis

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## General Comment

We need proper immigration procedures so that we know who is here. You don't let people you don't know into your house, do you?

AR002019

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-nved
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0447

Comment Submitted by Frank Blackwood

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## Submitter Information

**Name:** Frank Blackwood

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## General Comment

Dear Lord

Please give all our governmental  
leaders godly supernatural wisdom.

I pray for a great outpouring of your Holy Spirit and may everyone in our country put their  
trust in Jesus Christ as Lord and Savior.

AR002020

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d58-2bgk <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0448

Comment Submitted by David Maiullo

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## Submitter Information

**Name:** David Maiullo

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## General Comment

Support Legal but limited immigration. Put American citizens first.

AR002021

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-snk0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0449

Comment Submitted by Donald Carter

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## Submitter Information

**Name:** Donald Carter

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## General Comment

I urge you to please pay close attention to President Trump's  
Immigration reforms and move favorably on those for the security and fairness of the USA on our borders.

AR002022

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-hn0m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0450

Comment Submitted by Gerrye Fielden

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## Submitter Information

**Name:** GERRYE Fielden

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## General Comment

by law, the Trump Administration or ANY administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

Rushing this process forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are playing by the rules. Thats INSANE!

Why the Left is supporting a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline is beyond me.

This has to change and it must change NOW!

AR002023

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-ehwu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0451

Comment Submitted by Daryl Tabor

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## Submitter Information

**Name:** Daryl Tabor

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## General Comment

Please SUPPORT our President's Immigration Reforms.

AR002024

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d58-g2zc <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0452

Comment Submitted by Tammy Monson

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## Submitter Information

**Name:** Tammy Monson

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## General Comment

I implore you to support President Trumps Immigration plan for America. What has been pushed before does not work for our great country. We need this common sense and financial approach to keep America vibrant for our future and our childrens future. Again, please support the Presidents plan. Thank you for your time.

AR002025



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-tc4a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0453

Comment Submitted by Alex Mersinger

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## Submitter Information

**Name:** Alex Mersinger

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## General Comment

This is very dumb and bad for the economy. Don't do this.

AR002026

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-uknh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0454

Comment Submitted by Madeline Davis

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## Submitter Information

**Name:** Madeline Davis

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## General Comment

Instead of working with President Trump to fix our broken immigration system, radical Leftists are fighting to protect the Beltways beloved status quo.

They don't care that the current system punishes people for coming here LEGALLY or that it weakens our national security. They just want to make President Trump and Ken Cuccinelli look bad.

Help President Trump and Ken Cuccinelli secure Americas safety by submitting a formal comment NOW!

By law, the Trump Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

This forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are playing by the rules.

For the better part of 3 years all the Republicans do is sit on their hands and do nothing or very little. Some of you side with the democratic communist party or abstain form voting so that you can not held accountable.

AR002027

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-yqdy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0455

Comment Submitted by Lisa Vestal

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## Submitter Information

**Name:** Lisa Vestal

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## General Comment

It is important to build a wall to keep illegal immigrants from coming in by the troves. Also please, open borders is not a good idea because I believe it will overload an already stressed system.

AR002028

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-wk9r
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0456

Comment Submitted by Giovanni Catanese

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## Submitter Information

**Name:** Giovanni Catanese

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## General Comment

I'm asking you to work with President Trump to fix our broken immigration system. The radical Leftists don't care that the current system punishes people for coming here LEGALLY or that it weakens our national security. They just want to make President Trump and Ken Cuccinelli look bad.

Please help President Trump and Ken Cuccinelli secure Americas safety!

The main problem is that by law, the Trump Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

This arbitrary (and short period) forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are playing by the rules. Thats INSANE!

Why the Left is supporting a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline is beyond me.

This has to change and it must change NOW!

Thats why Im asking you to help President Trump and Ken Cuccinelli remove these ridiculous restrictions and secure Americas safety NOW!

AR002029

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-ijcj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0457

Comment Submitted by Debbi Penir

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## Submitter Information

**Name:** Debbi Penir

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## General Comment

I support President Trump and his immigration reforms! Please help him and our country and stop the insanity!

AR002030

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d58-8sa1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0458

Comment Submitted by Timothy Little

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## Submitter Information

**Name:** Timothy Little

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## General Comment

Stop illegal immigration, our great president is doing a great job bringing jobs back. BUILD THE WALL

AR002031

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-p2z0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0459

Comment Submitted by Dan Savickas

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## Submitter Information

**Name:** Dan Savickas

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## General Comment

Please finalize and implement this important asylum reform. The existing rules are outdated and direct resources away from other legal applicants. It also undermines our ability to vet potentially dangerous incomers. Please move forward with this rule making.

AR002032

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-7vmz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0460

Comment Submitted by Wayne Roberson

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## Submitter Information

**Name:** Wayne Roberson

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## General Comment

We need to enforce the laws and stop impeding progress on immigration reform. We need the wall. How many other countries have walls or physical barriers of some sort? I support all that President Trump is doing! Please help him put our citizens first! Not illegal immigrants who are breaking the laws!

AR002033



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d58-ijav <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0461

Comment Submitted by John Hamilton

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## Submitter Information

**Name:** John Hamilton

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## General Comment

I am asking you to support President Trump's immigration reforms . We need to fix our broken immigration system . I'm asking you to remove the ridiculous restrictions on screening each asylum seeker coming into our country .

AR002034

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-twb9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0462

Comment Submitted by Robert Ready

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## Submitter Information

**Name:** Robert Ready

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## General Comment

Immigration reform is something that we must support if we expect to get America back on track. I strongly urge you to support President Trumps Immigration reforms that he has proposed.

AR002035

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-9841
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0463

Comment Submitted by Mohammad Raza

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## Submitter Information

**Name:** Mohammad Raza

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## General Comment

largest majority of asylum seekers are those who hardly manage to buy their plane ticket for themselves and dependents. Those who apply for asylum in US are already in a very weak position as they would have lost their job, earning, in most cases their saving, roof over their head and any material we can think of. Added to that is, in most cases, they flee with their dependents and when landing in US, are faced with the living expenses i.e. house rent and other expenses which are far above their level of financial tolerance. Prolonged waiting period without certainty while waiting for work permit can either force them to then "flee the US" or resort to unauthorized working conditions out of deparation, where they will be deprived of all the basic rights any worker should have and not to mention the loss in taxes and relevant government benefits. Without ability to work in order to provide for their family and at least to maintain a roof over their head is worse than rejecting their asylum request. Imagine kids with their parent evicted from their home because they are unable to pay their rent and it is because they are not authorized to work yet. Not to mention that for any immigrant, the first one year in US or any other country is the most difficult part of their lives.

AR002036

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-lkas
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0464

Comment Submitted by Manikandan Sivasankar

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## Submitter Information

**Name:** Manikandan Sivasankar

**Address:**

711 Pelican beach

San Antonio, TX, 78221

**Email:** manikandansivasankar@gmail.com

**Phone:** 4155280244

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## General Comment

I think, it is the most inhuman regulation and requirement by the government authorities to subject the people who fear for their life or seek protection. This encourages people to continue to do illegal things and commit crimes and it is a vicious cycle helping the criminals to exploit the weaker section of the society.

AR002037

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-hwt5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0465

Comment Submitted by Marie Ambrosino

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## Submitter Information

**Name:** Marie Ambrosino

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## General Comment

Like all things in time, our society changes our laws to represent the opinions of its people. Yes we welcome legitimate immigrants who come to our country for political and religious freedoms. BUT we must do our due diligence to make sure these immigrants are not coming here to do harm. Our country is the strongest because it was based on freedoms we have. Please be weary of the changes in our world, our enemies who have attract us numerous times already must be screened for our protection. Be forewarned that we have been watching your votes and not just listening to you

AR002038

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-8o7v
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0466

Comment Submitted by Ronald Hainke

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## Submitter Information

**Name:** Ronald Hainke

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## General Comment

I am writing to ask that you support President Trump's Immigration Reforms, as our borders must be protected and all illegal crossings must be repelled to keep our country safe.

AR002039

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-ansv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0467

Comment Submitted by Mel Vogel

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## Submitter Information

**Name:** Mel Vogel

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## General Comment

Follow the law in lieu of your political agenda. The democrats should realize this sick attack on a sitting president could turn into a real coup and a coup that could take out sitting members of the democrats. Just check out other countries where an attempted coup has been attempted.

AR002040

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-u996
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0468

Comment Submitted by Rick Billiard

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## Submitter Information

**Name:** Rick Billiard

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## General Comment

Please support the Trump Administration immigration reforms. They are just common sense.

AR002041



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-kcod
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0469

Comment Submitted by Laurelle Hess

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## Submitter Information

**Name:** Laurelle Hess

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## General Comment

We need to stand by our President and his immigration reforms. We need to close our borders and vet all these people properly before we let them enter our country. My grandparents came here the legal way not by invading this country and sneaking in across the borders. BUILD THE WALL and give our border patrol more authority to return these illegal aliens to their own country.

AR002042

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-z33e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0470

Comment Submitted by Myrna Curtis

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## Submitter Information

**Name:** Myrna Curtis

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## General Comment

Place our military all around our entire borders. That's their job! To protect Americans from all threats! That should stop illegals and drugs!

AR002043

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d58-2dtu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0471

Comment Submitted by Jim Miles

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## Submitter Information

**Name:** Jim Miles

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## General Comment

The time has come for the US Congress and the so-called Washington establishment to support President Trump's efforts to implement much needed immigration reform. Priority should be given to construction of a wall on our southern border. Illegal immigrants must be stopped at the border. In conjunction with building the wall we must begin to start deporting all illegal aliens.

AR002044

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-3xla
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0472

Comment Submitted by Darrell Simpson

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## Submitter Information

**Name:** Darrell Simpson

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## General Comment

Stop illegal immigration please

AR002045

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-h1j1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0473

Comment Submitted by Manikandan Sivasankar

---

## Submitter Information

**Name:** Manikandan Sivasankar

**Address:**

711 Pelican beach  
San Antonio, TX, 78221

**Email:** manikandansivasankar@gmail.com

**Phone:** 4155280244

**Government Agency Type:** Federal

**Government Agency:** USCIS

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## General Comment

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

All these arguments are true and valid and more than that where is the dignity in human life when we our self treat the people who are vulnerable and fear for life and seek protection to be treated like slaves and subject them to harsh reality of judgment by delaying the right to work and seek help. This is not justice and support by the U.S. Government. This has to Stop and it is better to abolish the entire asylum application process than subjecting them to cruel and inhuman treatment of policy update and requirments.

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AR002046

## Attachments

USCIS\_765

The attachment is restricted to show metadata only because it contains personally identifiable information  
data  
PII

AR002047

October 23, 2019

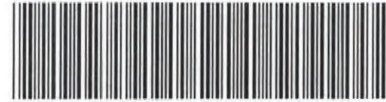
MANIKANDAN SIVASANKAR  
711 PELICAN BEACH  
SAN ANTONIO, TX 78221

RE: I-765, Application for Employment Authorization



U.S. Department of Homeland Security  
U.S. Citizenship and Immigration Services  
Texas Service Center  
PO BOX 852381  
Mesquite, TX 75185-2381

U.S. Citizenship  
and Immigration  
Services



SRC1990567292



A206-345-241

### DECISION

Reference is made to the Application for Employment Authorization (Form I-765) filed with U.S. Citizenship and Immigration Services (USCIS) on September 23, 2019, in accordance with Title 8, Code of Federal Regulations (8 CFR) § 274a.12(c)(8). After consideration, it is ordered that Form I-765 be denied.

8 CFR § 274a.12 states in pertinent part:

*(c) Aliens who must apply for employment authorization.* An alien within a class of aliens described in this section must apply for work authorization...(8) An alien who has filed a complete application for asylum or withholding of deportation or removal pursuant to 8 C.F.R. § 208,...

8 CFR § 103.2 states in pertinent part:

*(a) Filing. (1) Preparation and submission.* Every benefit request or other document submitted to DHS must be executed and filed in accordance with the form instructions, notwithstanding any provision of 8 CFR chapter 1 to the contrary, and such instructions are incorporated into the regulations requiring its submission. Each benefit request or other document must be filed with fee(s) as required by regulation. Benefit requests which require a person to submit biometric information must also be filed with the biometric service fee in 8 CFR 103.7(b)(1), for each individual who is required to provide biometrics. Filing fees and biometric service fees are non-refundable and, except as otherwise provided in this chapter I, must be paid when the benefit request is filed.

An applicant must mark Form I-765 as "Permission to accept employment" when requesting the first employment authorization document under category (c)(8). Form I-765 filing instructions indicate that no fee is generally required for an initial (c)(8) request.

Form I-765 must be marked by the applicant as "Renewal of my permission to accept employment" when a previous employment authorization document has been issued under the same filing category as the one being requested. An I-765 filing fee is required for a renewal (c)(8) request.

AR002048



USCIS records indicate that you were previously granted employment authorization under category (c)(8). Since no fee was provided for the current renewal request, Form I-765 is not considered properly filed, and must be denied.

There is no appeal from this decision. You may file a motion to reopen or reconsider. Your motion to reopen or reconsider must be filed on Form I-290B, Notice of Appeal or Motion, within 30 days of the date of this notice (33 days if this notice is received by mail). For the latest information on filing location, fee, and other requirements, please review the Form I-290B instructions at <http://www.uscis.gov/forms>, call our USCIS Contact Center at 1-800-375-5283, or visit your local USCIS office. If USCIS does not receive a properly filed motion, this decision will become final.

This decision does not prevent you from filing any petition or application in the future.

Sincerely,



Gregory A. Richardson  
Director, Texas Service Center  
Officer: XM1774





# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-wik4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0474

Comment Submitted by Ava Early

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## Submitter Information

**Name:** ava early

---

## General Comment

Please support President Trumps Immigration Reforms.

Each asylum seeker should be checked out for 30 days before being given asylum in this country.

AR002050

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-zugg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0475

Comment Submitted by Richard Przybylski

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## Submitter Information

**Name:** Richard Przybylski

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## General Comment

Please support President Trump. It is time to stop being nice. There are no facts to support impeachment.

AR002051

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d58-ugm0 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0476

Comment Submitted by Gregory Rivers

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## Submitter Information

**Name:** gregory rivers

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## General Comment

i realize things in the world are not right, but we as a nation, just like individual, can not help everyone. it is ludicrous to think we can continue to allow illegals to come in our country at the pace it is. we can not afford this catastrophe to go on. we do not have the resources nor the ability to take these illegal in. stop it. close the borders, deport illegals, and protect our country. thank you and God bless you,

AR002052

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-3j4x
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0477

Comment Submitted by Kelly Agnew-Barajas

---

## Submitter Information

**Name:** Kelly Agnew-Barajas

**Address:**

10 Slocum Place

Apt 4A

Brooklyn, 11218

**Email:** kelly.agnew.barajas@gmail.com

**Phone:** 7185947250

---

## General Comment

Asylum seekers can contribute and make sure they are able to support themselves while their asylum cases are pending if they have EADs as soon as possible. The proposed change would hinder asylum seekers' ability to support themselves. USCIS should allocate additional resources to process EADs for asylum seekers and all other applicants to ensure that people who are willing and able to work are able to do so legally.

AR002053

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-3y91
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0478

Comment Submitted by Susan Lea

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## Submitter Information

**Name:** Susan Lea

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## General Comment

There is no America. What was America is now just Alta Mexico. Everywhere Americans turn, we find Mexicans and other Hispanics/Latinx with all of the jobs, all of the affordable housing, buying new cars and trucks, and handed rights never before available to Americans. Enough. There are at least 50 Million Hispanics living in the USA that need to be returned to Mexico, Central America, S. America and Latin communities in the Caribbean countries. I have applied for 1599 jobs in the past 15 years, and I am tired of hearing the words, "We only hire Mexicans". 90% of construction workers are Mexicans. 90% of Cal Trans workers are Mexicans. Americans cannot get jobs yet everywhere I travel I am assaulted by Mexicans and Central Americans, most of whom are raping, killing, selling drugs, selling children, smuggling humans and engaged in sex trafficking. I've had guns pointed at my head by MS-13 gangbangers. I've been followed and survived kidnapping attempts by organized Hispanic criminals, and when I report these crimes, none of California's so called law enforcement officers will help me because California is a sanctuary state. Enough. Get rid of the INVASION of criminals who are hispanic/latinx etc. NOW. Thanks.

AR002054

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d58-o1tq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0479

Comment Submitted by Dale Maddox

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## Submitter Information

**Name:** Dale Maddox

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## General Comment

Please support our President!!!!

AR002055

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-nsyu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0480

Comment Submitted by Steven Bailey

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## Submitter Information

**Name:** Steven Bailey

---

## General Comment

I think its time for congress to start working for the citizens of this country for a change

AR002056

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-5ec9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0481

Comment Submitted by AM Newcomer

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## Submitter Information

**Name:** AM Newcomer

---

## General Comment

PLEASE just stop all the foolish partisanship and BUILD THE WALL ALREADY!!!! Enough of the stonewalling and backstabbing!!!! Act like adults and GET THE JOB DONE for ALL American CITIZENS!!! STOP worrying so much about foreigners and START CARING about your CITIZENS!!! WE the people are SICK and TIRED of DC BS!!!! GROW UP ALREADY!!!! Support our POTUS!!!!

AR002057



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-k254
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0482

Comment Submitted by Katie Jenkins

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## Submitter Information

**Name:** Katie Jenkins

---

## General Comment

I support President Trumps Immigration Reforms!

AR002058

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d58-91dp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0483

Comment Submitted by Samuel Gibbs

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## Submitter Information

**Name:** Samuel Gibbs

---

## General Comment

We are being invaded by immigrants from around the world.!! There is no way all of them can be checked out within 30 days unless you hire a lot more people to do this job.!! Since there is no way to do either one of these you need to get the law changed to give all the time needed to process all these invaders.!! If the immigrants do not like it, they could just stay home.!!

AR002059

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-bslg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0484

Comment Submitted by Carol Carlisle

---

## Submitter Information

**Name:** Carol Carlisle

---

## General Comment

Build the wall and stop illegal immigration! Enough is enough. Stop the benefits to illegal immigration. The deficit is high enough already. Cut the government by 50%. Stop the partisan politics and do your job.

AR002060

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-ss7s
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0485

Comment Submitted by Douglas Johnson

---

## Submitter Information

**Name:** Douglas Johnson

---

## General Comment

Please support President Trump as he works to secure our southern border.  
Thank You

AR002061

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-t81w
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0486

Comment Submitted by Ralph Thompson

---

## Submitter Information

**Name:** Ralph Thompson

---

## General Comment

Washington support President Trump's Immigration Reforms and take care of the US citizens first,we need your help.

AR002062

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-6yov
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0487

Comment Submitted by Marie Large

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## Submitter Information

**Name:** Marie Large

---

## General Comment

Please support President Trumps Immigration Reforms. We dont need to reward individuals who come here illegally.

AR002063

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-mx9d
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0488

Comment Submitted by Joan DeLorenzo

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## Submitter Information

**Name:** Joan DeLorenzo

---

## General Comment

Do your job; support President Trump's Immigration Reforms.

AR002064

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d57-19ig <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0489

Comment Submitted by Mary Hyatt

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## Submitter Information

**Name:** Mary Hyatt

---

## General Comment

Support President Trumps Immigration reforms. BUILD THE WALL.

AR002065



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d57-pzv6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0490

Comment Submitted by Suzanne Slocum

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## Submitter Information

**Name:** Suzanne Slocum

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## General Comment

Please write your comment here.

Please never admit anybody into the United States without proper full background check NO MATTER HOW LONG IT TAKES. This is how you prevent Isis, Criminals etc. into the country and prevent the increase of danger to all citizens.

AR002066

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-lbxk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0491

Comment Submitted by Alicia Willard

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## Submitter Information

**Name:** Alicia Willard

---

## General Comment

Illegal immigration has been a problem for decades. Democrats need to start supporting Trump's immigration reform agenda that he ran on. That is what the majority of Americans wanted, and the Democrats just keep stalling Trump's agenda every chance they get. When are the Democrats going to realize that they were elected by the people, for the people, and not against the people they represent. Start putting actual American citizens before illegals. Start doing the job you were elected to do. You do not represent non citizens. Get that through your heads. I cannot wait till the Democrats get voted out of office in 2020, as well as any Republicans that can't do their job right. MAGA 2020!!

AR002067

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-hdll
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0492

Comment Submitted by Frances Peterkin

---

## Submitter Information

**Name:** Frances Peterkin

---

## General Comment

We are in desperate need of some new laws on Immigration. Please help Presidents Trump make the changes that are necessary . and be able to in force the laws. I live in California and hate what our governors are doing. The governor we have is not a stable person I would leave California but I am to old to pick up and leave now. We must change the laws on immigration and be able to inform them in this country.

AR002068

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-hqlv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0493

Comment Submitted by Estrillita Nelson

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## Submitter Information

**Name:** estrillita nelson

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## General Comment

Please stop this insane movement to Impeach our President. He was voted in and I don't want to see this witch hunt go on any longer. He might not talk like you want him to, he might not vote with you on certain things, but he stands with Israel and I want a PRESIDENT that will do just that!.

Thank you Estrillita Nelson

AR002069

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-jdl3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0494

Comment Submitted by John Holden

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## Submitter Information

**Name:** John Holden

---

## General Comment

Support President Trump's immigration Reform. If you cannot vote for this much needed reform, I am left with no choice but to change my voting.

AR002070

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-6qwg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0495

Comment Submitted by Bill Ricker

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## Submitter Information

**Name:** Bill Ricker

---

## General Comment

Support ALL of Trump's immigration reforms!!!!

AR002071

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d57-wik2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0496

Comment Submitted by Sandra Reynolds

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## Submitter Information

**Name:** Sandra Reynolds

---

## General Comment

I Support President Trumps Immigration Reforms. America Supports his Immigration Reform.....Stop Trying to Block him at every turn on everything he does. Stop Your Bias and Your Obstruction now.....We The American People Demand it. You are over Reaching and Obstructing Everything he does....News Flash.....He has every Right to Protect our Country and us !!! You have every Right to Leave !

AR002072

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d57-y6g9 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0497

Comment Submitted by Elaine Post

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## Submitter Information

**Name:** Elaine Post

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## General Comment

Washington Im asking you to support President trumps immigration reform.

AR002073



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
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<b>Comments Due:</b> November 08, 2019
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0498

Comment Submitted by Charlene Saunders

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## Submitter Information

**Name:** Charlene Saunders

---

## General Comment

It is time for you to support President Trump's Immigration Reform. Earn your pay..

AR002074

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0499

Comment Submitted by Carole Hembree

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## Submitter Information

**Name:** Carole Hembree

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## General Comment

Help my President as he continues his work to make America safer for our children & grandchildren

AR002075

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0500

Comment Submitted by Jeffrey Belden

---

## Submitter Information

**Name:** Jeffrey Belden

---

## General Comment

This should never have gotten this far, I didn't serve in the Navy to support corrupt politicians who could care less about our country. Time for arrests to be made, traitors tried and convicted, or executed. Set examples so this never happens again. Congress is acting like the definition of a congress, "A large gathering of baboons". Term limits should be the law, so we, as Americans can feel secure with our freedoms, which I, and many others risked are lives to protect. Stop acting like spoiled little children, and do your job.

AR002076

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d57-p8pa <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0501

Comment Submitted by James Zeltner

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## Submitter Information

**Name:** James Zeltner

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## General Comment

We as hard working honest Americans ask you to please support President Trump and his cabinet. Thank you

AR002077

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0502

Comment Submitted by Kurt von Pessler

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## Submitter Information

**Name:** Kurt von Pessler

---

## General Comment

Please extend the time needed to do research on people who are requesting asylum from 30 days to 60 days.

AR002078

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0503

Comment Submitted by Roland Voisine

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## Submitter Information

**Name:** roland voisine

---

## General Comment

Any one who wants to immigrate to our country must follow all of the rules before they sneak in and try to jump to the head of the line. Send them home and tell them to start over and do the right way.

AR002079

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0504

Comment Submitted by Jay Johnson

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## Submitter Information

**Name:** Jay Johnson

---

## General Comment

Get to work for the USA and cut out the BS. You took an oath to uphold the law. If you don't like quite and move out of this country.

AR002080

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0505

Comment Submitted by Billy Guidroz

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## Submitter Information

**Name:** BILLY GUIDROZ

---

## General Comment

Please tell Washington to support President Trump's Immigration Reforms.

AR002081



# PUBLIC SUBMISSION

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<b>Posted:</b> November 06, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0506

Comment Submitted by Arthur Lykken

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## Submitter Information

**Name:** Arthur Lykken

---

## General Comment

Illegal immigration is just that illegal. Send them back. America can not stand the additional people here. it will snowball and leave us all hungry.

AR002082

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0507

Comment Submitted by Andrea Guttin, Houston Immigration Legal Services Collaborative

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## Submitter Information

**Name:** Andrea Guttin

**Address:**

2502 La Branch St  
Houston, TX, 77006

**Submitter's Representative:** Andrea Guttin

**Organization:** Houston Immigration Legal Services Collaborative

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## General Comment

See attached file(s)

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## Attachments

HoustonImmigrantsProfile\_FinalWeb

Hurricane\_Harvey\_-\_The\_Experiences\_of\_Immigrants\_Living\_in\_the\_Texas\_Gulf\_Coast

HILSC\_comment\_EAD

HILSC staff resumes

The attachment is restricted to show metadata only because it contains personally identifiable information data

Third-Party PII

AR002083

# A PROFILE OF HOUSTON'S DIVERSE IMMIGRANT POPULATION IN A RAPIDLY CHANGING POLICY LANDSCAPE



By Randy Capps and Ariel G. Ruiz Soto

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# **A PROFILE OF HOUSTON'S DIVERSE IMMIGRANT POPULATION IN A RAPIDLY CHANGING POLICY LANDSCAPE**

By Randy Capps and Ariel G. Ruiz Soto

September 2018



AR002085

## Acknowledgments

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The authors also thank their MPI colleagues, including Jessica Bolter, Julia Gelatt, and Laura Plata for their research assistance; Michael Fix and Sarah Pierce for their expert review and feedback; and Michelle Mittelstadt, Lauren Shaw, and Sara Staedicke for editorial and dissemination support.

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## Executive Summary

The Houston metropolitan area has one of the most rapidly growing and diverse populations in the nation.<sup>1</sup> As of 2017, it was home to 7 million residents, up from 6 million in 2010. At the same time, the area has continued to diversify, and by 2017 more Latinos than non-Hispanic Whites lived there. This demographic growth has been buttressed by the economic strength of the area. The Houston economy continues to boom, generating more new jobs in 2017–18 than any other metro area except New York and Dallas. In the aftermath of Hurricane Harvey, the Category 4 storm that damaged large swaths of the region in August 2017, construction workers—more than half of whom are immigrants—have been in particularly high demand.

Home to 1.6 million immigrants, ranging from high-skilled professionals to working-class families and international students, this incredibly diverse and dynamic area offers an interesting look at how national immigration policy changes under the Trump administration are being felt by immigrants and service providers at a local level. Starting in 2017, the administration has proposed and implemented policies to significantly ramp up immigration enforcement, restrict legal immigrant admissions, and curtail humanitarian protection programs for refugees, asylees, and other groups. Arrests of noncitizens by U.S. Immigration and Customs Enforcement (ICE) rose rapidly under the new administration, and in 2017 the Houston ICE office was responsible for the second-highest number of arrests after Dallas. The administration has also taken steps to end the Deferred Action for Childhood Arrivals (DACA) program and some Temporary Protected Status (TPS) designations for nationals of countries that have experienced natural disasters or civil unrest.

---

*This incredibly diverse and dynamic area offers an interesting look at how national immigration policy changes under the Trump administration are being felt ... at a local level.*

---

Analysis of the U.S. Census Bureau's American Community Survey (ACS) and other data sources offers important insights into the shifting composition of Houston's immigrant population and how policy changes may affect both immigrants in the area and the service providers that work with them. Leveraging the Migration Policy Institute's unique methodology for assigning immigration status to noncitizens, this study describes three groups: (1) legal permanent residents (LPRs, also known as green-card holders); (2) legal nonimmigrants (international students, H-1B holders, and other temporary workers); and (3) unauthorized immigrants.<sup>2</sup> The report also examines three groups of immigrants of particular interest, given recent policy changes: DACA beneficiaries, TPS holders, and asylum seekers.

Analysis of the ACS data draws a portrait of a dynamic and growing population. Among the key findings are:

- ***Immigrants are concentrated in Harris County, but the most significant growth is in the Houston suburbs.*** As of 2017, three-quarters of immigrants in the Houston metropolitan area lived in Harris County (1.2 million). However, the immigrant population showed more rapid growth in most of the area's 11 suburban counties—especially Matagorda, Liberty, Fort Bend, and Montgomery.

<sup>1</sup> This report defines the Houston metropolitan area as 12 counties, based on the boundaries available in American Community Survey (ACS) data: Austin, Brazoria, Chambers, Colorado, Fort Bend, Galveston, Harris, Liberty, Matagorda, Montgomery, Waller, and Wharton. This definition varies slightly from the official definition of the Houston metropolitan area employed by the U.S. Census Bureau.

<sup>2</sup> This analysis is primarily descriptive in nature and does not analyze the structural reasons behind the demographic differences between groups of immigrants.



- **Mexico remains the top origin country for immigrants in Houston, but the number of Mexican immigrants in the area fell between 2016 and 2017.** While the Mexican-born population in the Houston area grew 2 percent in the 2010–17 period, between 2016 and 2017 the number dropped by 4 percent to 612,000. Nationwide, the number of Mexican immigrants fell 2 percent between 2016 and 2017.
- **Immigrant populations from most other top origin countries grew more quickly from 2010 through 2017.** The largest percentage increases were seen among immigrants from Cuba and Venezuela (223 percent each), followed by Nigeria (139 percent). More broadly, there was rapid growth among the foreign-born population from Africa (82 percent) and substantial growth of those from Asia and Central America (29 percent and 34 percent, respectively).
- **Almost half of children in the Houston area are children of immigrants.** Immigrants comprised almost one-quarter of the total population of the Houston metropolitan area, and children with at least one foreign-born parent made up 44 percent of all children under age 18, as of 2016. An estimated 15 percent of minor children in Houston had at least one unauthorized immigrant parent, and 80 percent of these children of unauthorized immigrants were U.S. citizens.
- **Unauthorized immigrants make up slightly less than one-third of immigrants in the Houston area.** In 2016, an estimated 30 percent of immigrants in the Houston metropolitan area were unauthorized, compared to 33 percent who were naturalized citizens, 32 percent who were LPRs, and 5 percent who were legal nonimmigrants. Most unauthorized immigrants were from Mexico or Central America, but there were also significant populations from several Asian countries.
- **Immigrants are critical to Houston's workforce.** Thirty-two percent of the Houston area's workers were immigrants, and 10 percent were unauthorized in 2016. These shares were higher than the immigrant and unauthorized shares of the total Houston metro area population.
- **Most immigrants in the Houston metropolitan area own their homes.** Fifty-six percent of all immigrants in Houston owned their homes in 2016, as did 41 percent of unauthorized immigrants. Houston's overall homeownership rate is relatively high compared to other major metropolitan areas, due largely to its relatively low cost of housing.

Immigration policy changes enacted or under consideration by the Trump administration have the potential to affect large segments of the Houston immigrant population. Among these are:

- **Immigrants with some forms of temporary protection, such as DACA and TPS, face heightened uncertainty about the future.** Approximately 36,000 unauthorized immigrants in the Houston area who entered the United States as children currently participate in the DACA program, which allows them to work legally in the United States and shields them from deportation. Although the courts have enjoined the administration's cancellation of the program, allowing prior recipients to reapply but not accepting new first-time applications, the matter is still pending in the U.S. Supreme Court. If the court allows the administration to cancel DACA, current beneficiaries will lose status once their two-year eligibility periods expire.

In addition, tens of thousands of immigrants in the Houston area who currently hold TPS will lose this status over the next two years. In Houston, the largest groups of TPS holders are from El Salvador (16,000 immigrants) and Honduras (5,000), both groups whose status the Trump administration has terminated. Unlike DACA participants, TPS holders will lose protection all at once: Salvadorans in September 2019 and Hondurans in January 2020. Many will face a difficult decision when their status expires: remain in the country as unauthorized immigrants, without the work authorization and protection from deportation TPS afforded them, or return to countries they have not lived in for years or even decades.





- ***The narrowing of the grounds for asylum is likely to affect many Central American asylum seekers.*** A recent finding by the U.S. Attorney General and instructions from U.S. Citizenship and Immigration Services make it much more difficult for those fleeing gang or domestic violence to obtain asylum—the two grounds on which Central Americans most frequently file asylum claims. The Houston area is likely to feel the effects of these changes acutely, with the claims of an estimated 27,000 asylum seekers either pending with the Houston USCIS asylum office or in the Houston immigration courts.
- ***Expanded immigration enforcement priorities have led to an increase in how many detainees ICE issues for immigrants in Houston jails.*** While the Obama administration narrowed the categories of noncitizens considered priorities for arrest and deportation to those convicted of serious crimes, recent arrivals, and those with recent removal orders, the Trump administration has expanded this list to include any deportable immigrant convicted, arrested, or suspected of committing any crime. Following this expansion of priorities, ICE arrests increased 30 percent nationwide between FYs 2016 and 2017, and a more modest 5 percent in the Houston ICE region, though from an already-high level.<sup>3</sup> During the first three months of the Trump administration, Harris County was second only to Maricopa County, Arizona, in terms of the number of people transferred into ICE custody using detainees.<sup>4</sup> The number of ICE transfers increased rapidly even though Harris County ended its 287(g) agreement, under which ICE had trained and delegated some of its immigration enforcement authority to local officers. In August 2017, Texas enacted legislation (Senate Bill 4) requiring counties to fully cooperate with ICE in identifying removable immigrants in jails and transferring them into ICE custody.
- ***The public-charge rule the Trump administration is developing could affect large shares of the noncitizen population in Houston.*** The pending rule would make it more difficult for noncitizens to receive a green card (i.e., adjust their status) if they or a dependent family member have used cash welfare, food assistance, or other public benefits. Among the broader population of noncitizens who may feel the effects of this rule are some unauthorized immigrants who, while ineligible for most public benefits themselves, have dependent spouses and children who are U.S. citizens or legal immigrants eligible for such benefits. An estimated 98,000 unauthorized immigrants in the Houston area are married to a U.S. citizen or LPR; they may find their already limited options for acquiring legal status narrower still if their spouses or U.S.-born children have accessed public benefits.

In addition to policy changes, immigrants in the Houston area have also been among those most affected by Hurricane Harvey, and some may require legal assistance with housing- and employment-related issues. Immigrants who experienced housing damage were less likely than U.S.-born residents to have home or flood insurance, or to apply for disaster assistance. Almost half of respondents in a survey conducted in December 2017 expressed concerns that seeking assistance would draw attention to their or a family member's unauthorized status. Other studies since the hurricane have reported instances of landlords evicting or refusing to repair the homes of unauthorized immigrants, and wage theft among those working in rebuilding jobs.

These trends have a number of implications for Houston area service providers. The need for deportation defense—in local detention centers and centers across Texas—is growing as the number of immigrants arrested by ICE increases. Asylum cases are also becoming more complex as the administration narrows asylum criteria and shifts strategies for border enforcement, including prosecuting all unauthorized border crossers for criminal entry and, for a period, separating parents from children upon apprehension at the border. Many DACA recipients and TPS holders will also need assistance with their renewal applications as long as these protections remain in place, and guidance in understanding the other paths

3 Data on U.S. Immigration and Customs Enforcement (ICE) arrests are for the 54 counties in the Houston ICE region in southeast Texas. ICE arrest data for the 12-county Houston metropolitan area, specifically, are unavailable.

4 Detainers are requests ICE makes to state or local law enforcement agencies to hold deportable immigrants in state or local custody for up to two additional days, giving ICE time to pick them up and place them in deportation proceedings. In the Houston area, ICE issued 95 percent of detainers in Harris County (an average of 381 a month) in early fiscal year (FY) 2018. About half of these detainers resulted in the immigrant being taken into ICE custody.



to protection or legal status they may qualify for, if and when DACA and TPS end. Finally, an estimated 298,000 immigrants in the Houston area are eligible to naturalize and may come forward, seeking assistance in navigating the process. All these groups include significant numbers of individuals who are low income and may only be able to access legal assistance if it is provided pro bono or subsidized. For those with limited English proficiency, the availability of assistance in other languages, as well as interpretation and translation services, will be important.

## I. Introduction

The Houston metropolitan area has a population that is both diverse and growing. This growth is driven by immigration and domestic migration to the area, as well as a growing population of U.S.-born children, a significant share of whom are children of immigrants. The Houston area's economy is strong, and efforts to rebuild in the aftermath of Hurricane Harvey, which hit the area in August 2017, have increased demand for workers in the immigrant-dense construction industry. Like other regions with large immigrant communities, Houston and its suburbs have also been affected by the significant immigration policy changes the Trump administration has implemented since taking office in January 2017, including ramped up interior enforcement, the termination of Temporary Protected Status (TPS) designations for nationals of six countries, and the legal tug-of-war over the future of the Deferred Action for Childhood Arrivals (DACA) program. Due to its proximity to the Rio Grande Valley in south Texas, the busiest stretch of the U.S.-Mexico border, Houston has also felt the effects of changes to asylum and border enforcement policies.

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*This growth is driven by immigration and domestic migration to the area, as well as a growing population of U.S.-born children, a significant share of whom are children of immigrants.*

---

This report aims to inform public debates on immigration and immigrant integration policies in the Houston area, and to provide valuable information to the legal aid and other service providers who work with its immigrant populations. It begins with an overview of the region and recent events that have affected its residents, before providing an in-depth profile of the Houston foreign-born population, based on the most recent American Community Survey (ACS) data available. Using a unique methodology for assigning legal status to nonimmigrants developed by the Migration Policy Institute (MPI), this profile includes a particular focus on the characteristics of unauthorized immigrants and of three immigrant groups deeply affected by recent policy changes: DACA beneficiaries, TPS holders, and asylum seekers.<sup>5</sup> The study also attempts to quantify local immigration enforcement changes using data on arrests and detainers issued by U.S. Immigration and Customs Enforcement (ICE). It concludes with an assessment of what these immigration trends and policy changes mean for service providers in the Houston area.

Except where noted otherwise, this study presents findings for the 12-county greater Houston metropolitan area, a geographic definition based on the boundaries available in the ACS microdata employed for this analysis; these counties are Austin, Brazoria, Chambers, Colorado, Fort Bend, Galveston, Harris, Liberty, Matagorda, Montgomery, Waller, and Wharton. This definition varies slightly from the official definition of the Houston metropolitan area employed by the U.S. Census Bureau.

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<sup>5</sup> The Migration Policy Institute (MPI), like other research organizations, includes the Deferred Action for Childhood Arrivals (DACA), Temporary Protected Status (TPS), and asylum-seeker populations as subsets of the overall unauthorized population in its data analysis. Some asylum seekers file claims upon reaching a U.S. port of entry, others after entering the United States without authorization, and still others while holding a temporary legal status.



## II. A Diverse Metropolitan Area in an Era of Change

In 2017, the U.S. Census Bureau estimated the Houston area's population to be 6.9 million, up 16 percent from 2010.<sup>6</sup> Of the 972,000 new residents who came to the area during this period, 260,000 came via international migration and 273,000 from migration within the United States. Another 436,000 were the result of a “net increase” in the Houston population (births minus deaths).<sup>7</sup> Between 2016 and 2017, the Houston-Woodlands-Sugar Land metro area was the second fastest growing metropolitan area in the country, after Dallas-Fort Worth-Arlington.<sup>8</sup>

Beginning in 2010, the U.S. Census reported the absence of a racial/ethnic majority in Houston, a pattern that has continued through at least 2017.<sup>9</sup> In that year, according to ACS data, the number of Latinos surpassed the number of non-Hispanic Whites living in the Houston area for the first time (2.6 million and 2.5 million, respectively). There were also about 1.2 million African Americans and 500,000 Asians in the area.<sup>10</sup> Ongoing immigration, primarily from countries in Latin America and Asia, has contributed to the diversity of the area's population.

The Houston labor market has experienced strong job growth, despite an unemployment rate above the national average. In July 2018, the unemployment rate in Houston was 4.4 percent compared to 3.9 percent nationwide.<sup>11</sup> Between July 2017 and June 2018, however, Houston added more jobs—95,000—than any other metropolitan area except New York and Dallas, with a strong employment growth rate of 3.1 percent.<sup>12</sup>

### A. Hurricane Harvey and Its Aftermath

When Hurricane Harvey swept through Houston and the surrounding region in August 2017, it caused widespread flooding and damage to homes, businesses, and infrastructure. In a December 2017 survey of residents in 24 southeastern Texas counties,<sup>13</sup> immigrants were more likely than U.S.-born respondents to report income or job loss due to the hurricane (64 percent versus 39 percent). Although immigrants were less likely to report home damage, those who did describe experiencing such damage were

- 6 U.S. Census Bureau, “American FactFinder—PEPANNRES: Annual Estimates of the Resident Population: April 1, 2010 to July 1, 2017. 2017 Population Estimates. Houston-The Woodlands-Sugar Land, TX Metro Area,” updated May 2018, [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=PEP\\_2017\\_PEPANNRES&prodType=table](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=PEP_2017_PEPANNRES&prodType=table).
- 7 U.S. Census Bureau, “American FactFinder—PEPTCOMP: Estimates of the Components of Resident Population Change: April 1, 2010 to July 1, 2017. 2017 Population Estimates. Houston-The Woodlands-Sugar Land, TX Metro Area,” updated March 2018, [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=PEP\\_2017\\_PEPTCOMP&prodType=table](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=PEP_2017_PEPTCOMP&prodType=table).
- 8 U.S. Census Bureau, “New Census Bureau Population Estimates Show Dallas-Fort Worth-Arlington Has Largest Growth in the United States” (news release CB18-50, March 22, 2018), [www.census.gov/newsroom/press-releases/2018/popest-metro-county.html](http://www.census.gov/newsroom/press-releases/2018/popest-metro-county.html).
- 9 Michael O. Emerson et al., *Houston Region Grows More Racially/Ethnically Diverse, With Small Declines in Segregation* (Houston: Rice University, Kinder Institute for Urban Research and Hobby Center for the Study of Texas, 2012), <https://kinder.rice.edu/sites/g/files/bxs1676/f/documents/Houston%20Region%20Grows%20More%20Ethnically%20Diverse%204-9.pdf>.
- 10 U.S. Census Bureau, “American FactFinder—B03002: Hispanic or Latino Origin by Race. 2017 American Community Survey 1-Year Estimates. Houston-The Woodlands-Sugar Land, TX Metro Area,” accessed September 14, 2018, [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_17\\_1YR\\_B03002&prodType=table](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_1YR_B03002&prodType=table).
- 11 U.S. Bureau of Labor Statistics, “Local Area Unemployment Statistics—Unemployment Rates for Large Metropolitan Areas, Not Seasonally Adjusted—July 2018,” updated August 29, 2018, [www.bls.gov/web/metro/laurgma.htm](http://www.bls.gov/web/metro/laurgma.htm); U.S. Bureau of Labor Statistics, “Labor Force Statistics from the Current Population Survey,” accessed August 30, 2018, <https://data.bls.gov/timeseries/LNS14000000>.
- 12 U.S. Bureau of Labor Statistics, “Metropolitan Area Employment and Unemployment—June 2018” (news release USDL-18-1239, August 1, 2018), [www.bls.gov/news.release/pdf/metro.pdf](http://www.bls.gov/news.release/pdf/metro.pdf).
- 13 Bryan Wu, et al., *Hurricane Harvey: The Experiences of Immigrants Living in the Texas Gulf Coast* (Menlo Park, CA and Houston: Kaiser Family Foundation and Episcopal Health Foundation, 2018), <http://files.kff.org/attachment/Report-Hurricane-Harvey-The-Experiences-of-Immigrants-Living-in-the-Texas-Gulf-Coast>.



less likely than the U.S. born to say they had applied for disaster assistance (49 percent versus 64 percent) or that they had any type of home or flood insurance (41 percent versus 55 percent). Among immigrants with damaged homes, 46 percent worried that seeking assistance would draw attention to their unauthorized status or the status of a family member. Other studies since the hurricane have reported abuse of unauthorized immigrants by landlords (e.g., in the form of failure to repair hurricane damage or forced eviction), and that most did not access assistance from the Federal Emergency Management Agency (FEMA) as recipients must first prove their citizenship or legal residence.<sup>14</sup>

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*While unauthorized immigrants ... were among the Houston residents hardest hit by the storm, they are also playing key roles in reconstruction and clean-up efforts.*

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Unauthorized immigrant workers from Mexico and Central America have been engaged in Houston's clean-up efforts after Harvey. In a survey of 361 construction day laborers, conducted in the weeks after the hurricane, 72 percent were unauthorized immigrants, with nearly half of the unauthorized from Mexico and most of the rest from Guatemala, Honduras, or El Salvador. Most were longtime Houston residents, with 37 percent having lived in the area for more than ten years and another 29 percent for five to ten years. Day laborers' average hourly wages ranged from \$12 to \$14 per hour, depending on their precise occupation, but 26 percent reported wage theft in the four weeks following Harvey and many described not having received proper information about job hazards or protective gear.<sup>15</sup> In short, while unauthorized immigrants—and in particular, those from Mexico and Central America—were among the Houston residents hardest hit by the storm, they are also playing key roles in reconstruction and clean-up efforts.

## **B. Changing Immigration Policy Climate**

Another major force of change in the Houston area has been the sweeping set of immigration policy changes introduced by the Trump administration since taking office in January 2017. Chief among these have been efforts to curtail legal immigration from certain countries, reduce refugee admissions, restrict grants of asylum, ramp up immigration arrests and deportations from inside the United States, end the DACA program, terminate TPS designations for nationals of certain countries, and prosecute more migrants apprehended for illegally crossing the U.S.-Mexico border.<sup>16</sup>

These policy changes have had a profound effect on the large immigrant population of the Houston metropolitan area, and on the providers of legal and other services to immigrants based there. The administration's January 2017 executive order that banned the admission of travelers from certain countries in the Middle East and Africa<sup>17</sup> caused considerable confusion at large international airports, including George Bush Intercontinental in Houston, when it went into effect and travelers from the listed countries were turned back or held in immigration detention. Most elements of the executive

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14 Lomi Kriel and Roque Planas, "Hurricane Harvey Drove Houston's Undocumented Population Further Underground," Huffington Post, October 27, 2017, [www.huffingtonpost.com/entry/hurricane-harvey-houston-undocumented\\_us\\_59f22b98e4b03cd20b804b2c](http://www.huffingtonpost.com/entry/hurricane-harvey-houston-undocumented_us_59f22b98e4b03cd20b804b2c).

15 Nik Theodore, *Houston's Day Labor Markets in the Aftermath of Hurricane Harvey* (Chicago: University of Illinois at Chicago, Great Cities Institute, 2017), [https://greatcities.uic.edu/wp-content/uploads/2017/11/After-the-Storm\\_Theodore\\_2017.pdf](https://greatcities.uic.edu/wp-content/uploads/2017/11/After-the-Storm_Theodore_2017.pdf).

16 Sarah Pierce, Jessica Bolter, and Andrew Selee, *Trump's First Year on Immigration Policy: Rhetoric vs. Reality* (Washington, DC: MPI, 2018), [www.migrationpolicy.org/research/trump-first-year-immigration-policy-rhetoric-vs-reality](http://www.migrationpolicy.org/research/trump-first-year-immigration-policy-rhetoric-vs-reality).

17 Donald J. Trump, "Executive Order 13769 of January 27, 2017, Protecting the Nation from Foreign Terrorist Entry into the United States," *Federal Register* 82, no. 20 (February 1, 2017): 8977-82, [www.gpo.gov/fdsys/pkg/FR-2017-02-01/pdf/2017-02281.pdf](http://www.gpo.gov/fdsys/pkg/FR-2017-02-01/pdf/2017-02281.pdf).





order were initially blocked in court, but after considerable litigation and two revisions of the travel ban, the Supreme Court allowed it to take effect for virtually all entries from Chad, Iran, Libya, North Korea, Somalia, Syria, Venezuela, and Yemen.<sup>18</sup> The Houston area, as a major recipient of refugees resettled into the United States, has also been affected by the administration's decision to decrease the ceiling for refugee admissions in fiscal years (FYs) 2017 and 2018.<sup>19</sup> This has led to funding cuts for resettlement agencies and other refugee service providers that operate in the area.<sup>20</sup>

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*These changes have resulted in an increase in ICE arrests both nationwide and in jurisdictions such as Houston.*

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In January 2017, President Trump also signed an executive order expanding the categories of noncitizens to be considered priorities for arrest and deportation from the interior of the United States.<sup>21</sup> In 2014, the Obama administration had narrowed these arrest priorities to felons, those with substantial or misdemeanor convictions, recent arrivals, and migrants with recent removal orders. Trump's executive order has restored an older set of priorities that included deportable immigrants convicted, arrested, or suspected of committing any crime, or who are otherwise considered a public safety threat by immigration officers. The order also enhanced mechanisms to promote cooperation between ICE and state and local law enforcement agencies.<sup>22</sup> These changes have resulted in an increase in ICE arrests both nationwide and in jurisdictions such as Houston (see Section VII).<sup>23</sup> For example, ICE took into custody 60 percent more immigrants from the Harris County jail during the first three months of the Trump administration than it had a year earlier, and the number transferred to ICE from Harris County was second only to those transferred from Arizona's Maricopa County (Phoenix).<sup>24</sup>

The Houston area, and Texas more broadly, has also been the stage for some of the Trump administration's policies that aim to tighten security along the U.S.-Mexico border and deter unauthorized immigrants from crossing into the country. A third executive order issued in January 2017 called for a wall to be built along the border with Mexico and instructed the Border Patrol to end "catch and release" of families, children, and other asylum seekers into the United States after their apprehension pending their asylum cases or immigration court hearings.<sup>25</sup> In April 2018, in response to an increase in the number of border apprehensions, U.S. Attorney General Jeff Sessions announced a "zero-tolerance" policy of

18 *Trump, President of the U.S. et al. v. International Refugee Assistance, et al.; President of the U.S., et al. v. Hawaii, et al.* 583 U.S. \_\_\_\_ (2017), [www.supremecourt.gov/orders/courtorders/120417zr\\_4gd5.pdf](http://www.supremecourt.gov/orders/courtorders/120417zr_4gd5.pdf).

19 Pierce, Bolter, and Selee, *Trump's First Year on Immigration Policy*.

20 Elizabeth Trovall, "As Fewer Refugees Settle in Houston, Nonprofits Struggle to Maintain Operations," Houston Public Media, May 25, 2018, [www.houstonpublicmedia.org/articles/news/2018/05/25/287510/as-fewer-refugees-settle-in-houston-nonprofits-struggle-to-maintain-operations/](http://www.houstonpublicmedia.org/articles/news/2018/05/25/287510/as-fewer-refugees-settle-in-houston-nonprofits-struggle-to-maintain-operations/).

21 Donald J. Trump, "Executive Order 13768 of January 25, 2017, Enhancing Public Safety in the Interior of the United States," *Federal Register* 82, no. 18 (January 30, 2017): 8799–803, [www.gpo.gov/fdsys/pkg/FR-2017-01-30/html/2017-02102.htm](http://www.gpo.gov/fdsys/pkg/FR-2017-01-30/html/2017-02102.htm).

22 Randy Capps et al., *Revvig Up the Deportation Machinery: Enforcement under Trump and the Pushback* (Washington, DC: MPI, 2018), [www.migrationpolicy.org/research/revving-deportation-machinery-under-trump-and-pushback](http://www.migrationpolicy.org/research/revving-deportation-machinery-under-trump-and-pushback).

23 The number of U.S. Immigration and Customs Enforcement (ICE) arrests between February and September 2017 represented a 42-percent increase over the same period a year earlier; similarly, deportations from inside the United States increased by 37 percent. See ICE, *Fiscal Year 2017 ICE Enforcement and Removal Operations Report* (Washington, DC: ICE, 2017), [www.ice.gov/sites/default/files/documents/Report/2017/iceEndOfYearFY2017.pdf](http://www.ice.gov/sites/default/files/documents/Report/2017/iceEndOfYearFY2017.pdf).

24 Capps et al., *Revvig Up the Deportation Machinery*.

25 Since 2014, the Border Patrol has been apprehending large numbers of Central American families and children, but due to humanitarian concerns and court cases limiting their detention, most have been released into the United States pending their asylum cases and immigration court hearings—a process that can take years to complete. See Donald J. Trump, "Executive Order 13767 of January 25, 2017: Border Security and Immigration Enforcement Improvements," *Federal Register* 82, no. 18 (January 30, 2017): 8793–97, [www.gpo.gov/fdsys/pkg/FR-2017-01-30/pdf/2017-02095.pdf](http://www.gpo.gov/fdsys/pkg/FR-2017-01-30/pdf/2017-02095.pdf); Randy Capps, Faye Hipsman, and Doris Meissner, *Advances in U.S.-Mexico Border Enforcement: A Review of the Consequence Delivery System* (Washington, DC: MPI, 2017), [www.migrationpolicy.org/research/advances-us-mexico-border-enforcement-review-consequence-delivery-system](http://www.migrationpolicy.org/research/advances-us-mexico-border-enforcement-review-consequence-delivery-system).



prosecuting all unauthorized immigrant adults for the federal misdemeanor crime of illegal entry, separating children from parents in the process.<sup>26</sup> More than 2,500 children were separated from their parents before President Trump, in response to public outcry and a federal court injunction, signed an executive order ending family separations in June. The zero-tolerance policy for adults crossing without children remains in place, however, and other relatives apprehended with children are still being separated.<sup>27</sup> Advocates and legal service providers in Texas, many based in Houston, have been involved in identifying and assisting separated parents and children, as most separations happened in the Rio Grande Valley Sector in South Texas, though many parents and children were subsequently transferred to detention facilities around the country.

The administration has also announced the end of the DACA program and terminated TPS for some countries, two types of temporary immigration benefits that provide work authorization and protect more than 1 million immigrants from deportation nationwide.<sup>28</sup> The courts have temporarily enjoined DACA's rescission, leaving the program's approximately 702,000 beneficiaries—an estimated 36,000 of whom live in the Houston metropolitan area—protected, but with uncertain futures (see Section V.A).<sup>29</sup> The Trump administration's announcement that TPS would end for six countries including El Salvador and Honduras, whose nationals are well represented in the Houston area, has not been blocked by the courts and is set to take effect over the next two years (see Section V.B).<sup>30</sup>

Taken together, these policy changes have greatly increased demand for immigration services—legal and otherwise—in Houston and other parts of Texas. Affected populations potentially in need of services include DACA recipients and TPS holders, asylum seekers, and members of the unauthorized population. Additionally, large numbers of legal permanent residents will likely continue to seek assistance with their naturalization applications, as demand for naturalization is at a record high and wait times growing.<sup>31</sup>

### III. Profile of the Area's Foreign-Born Population

In 2017, the Houston metropolitan area was home to 1.6 million immigrants, making it the fifth largest foreign-born population in the United States after New York City, Los Angeles, Miami, and Chicago. Immigrants represented 24 percent of Houston's overall population. Notably, between 2010 and 2017, Houston's foreign-born population grew at the highest rate among these five large metro areas: 23

26 In the past, adults apprehended without children were prosecuted, but the policy shift announced by the attorney general in April 2018 meant that for the first time, adults apprehended with children would be prosecuted in large numbers in federal court. Since children cannot be prosecuted in federal court, this meant parents and children would be detained separately until the parents' cases had run their course. See Muzaffar Chishti and Jessica Bolter, "Family Separation and 'Zero-Tolerance' Policies Rolled Out to Stem Unwanted Migrants, But May Face Challenges," *Migration Information Source*, May 24, 2018, [www.migrationpolicy.org/article/family-separation-and-zero-tolerance-policies-rolled-out-stem-unwanted-migrants-may-face](http://www.migrationpolicy.org/article/family-separation-and-zero-tolerance-policies-rolled-out-stem-unwanted-migrants-may-face); Memorandum from Attorney General Jeff Sessions to All Federal Prosecutors, *Renewed Commitment to Criminal Immigration Enforcement*, April 11, 2018, [www.justice.gov/opa/press-release/file/956841/download](http://www.justice.gov/opa/press-release/file/956841/download).

27 After the executive order, parents apprehended at the border were no longer prosecuted for illegally entry and therefore no longer separated from their children; instead, some families are being held in detention together for a short period of time, while others are being released into the community. But other adults apprehended with children (e.g., grandparents, aunts, and uncles), and those apprehended without children continue to be prosecuted in larger numbers than before the attorney general's April 2018 policy memo. See Donald J. Trump, "Executive Order 13841 as of June 20, 2018: Affording Congress an Opportunity to Address Family Separation," *Federal Register* 83, no. 122 (June 25, 2018): 29435–36, [www.gpo.gov/fdsys/pkg/FR-2018-06-25/pdf/2018-13696.pdf](http://www.gpo.gov/fdsys/pkg/FR-2018-06-25/pdf/2018-13696.pdf).

28 Pierce, Bolter, and Selee, *Trump's First Year on Immigration Policy*.

29 U.S. Citizenship and Immigration Services (USCIS), "Approximate Active DACA Recipients" (dataset, May 31, 2018), [www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/DACA%20Expiration%20Data%20May%2031%202018.pdf](http://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/DACA%20Expiration%20Data%20May%2031%202018.pdf).

30 Pierce, Bolter, and Selee, *Trump's First Year on Immigration Policy*.

31 Alexa Ura, "Under Trump, the Backlog of U.S. Citizenship Applications in Texas is Growing," *Texas Tribune*, August 9, 2018, [www.texastribune.org/2018/08/09/trump-texas-backlog-citizenship-naturalization-applications/](http://www.texastribune.org/2018/08/09/trump-texas-backlog-citizenship-naturalization-applications/).

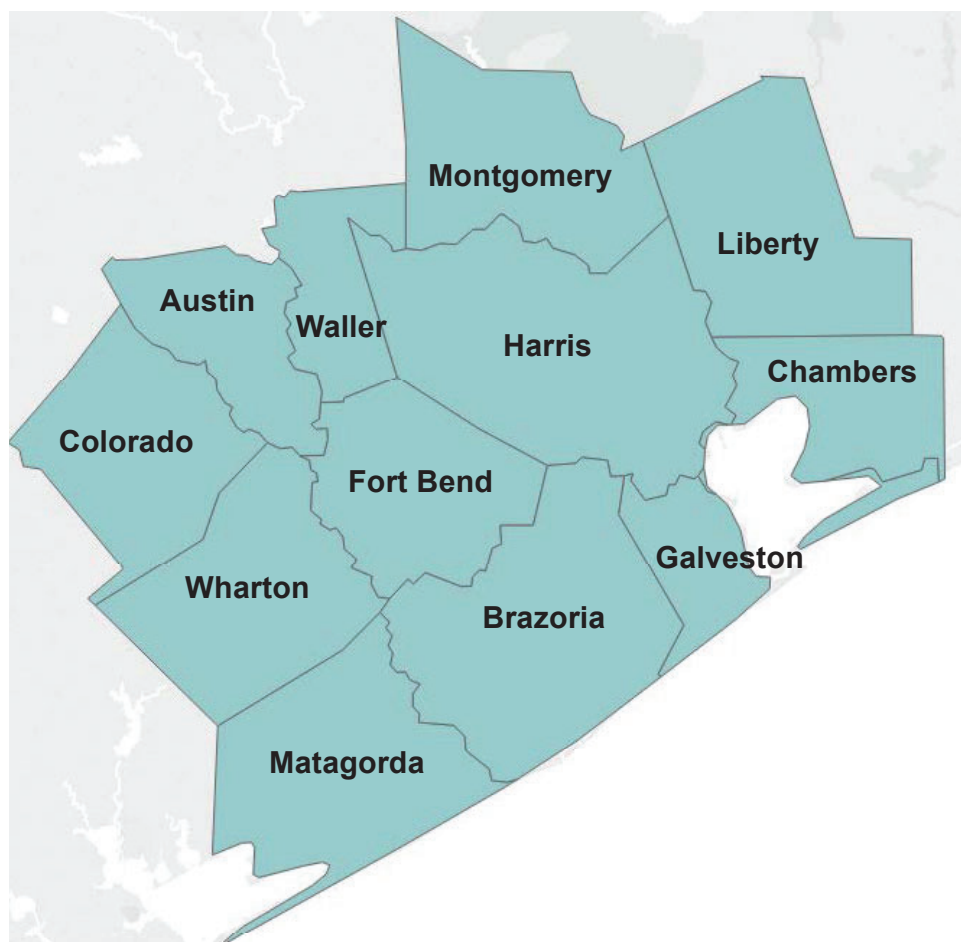


percent, compared with 17 percent for Miami, 9 percent for New York City, and no significant growth in Los Angeles or Chicago.<sup>32</sup>

### A. Geographic Concentration

Houston's foreign-born population is highly concentrated, with three-quarters of immigrants in the metropolitan area living in Harris County as of 2016 (see Table 1). But from 2010 through 2016, the foreign-born population grew more quickly in some of the 11 suburban counties than it did in Harris County, which encompasses the city of Houston. The counties with the highest growth rates were Matagorda, Liberty, Fort Bend, and Montgomery. Though 2017 ACS data were not yet available for all 12 counties when this report was published, early data show that the Harris County share of the area's immigrants remained steady.<sup>33</sup>

**Figure 1. The 12-County Houston Metropolitan Area**



*Note:* This study describes the Houston metropolitan area as comprised of 12 counties, based on the boundaries available in the U.S. Census Bureau's American Community Survey (ACS) public use microdata.

*Source:* Compilation by the authors.

<sup>32</sup> U.S. Census Bureau, "American FactFinder—B05002: Place of Birth by Citizenship Status—2010, 2016, and 2017 American Community Survey 1-Year Estimates," accessed September 14, 2018, <https://factfinder.census.gov/>.

<sup>33</sup> In 2017, Harris County had 1,224,000 foreign-born residents, 18,000 more than in 2016. The Fort Bend County foreign-born population grew by 16,000, and data for the remaining ten counties either showed no substantial growth or had not been released at the time of publication. Ibid.

**Table 1. Houston Metropolitan Area Foreign-Born Population, by County, 2010 and 2016**

	2010	2016	Change 2010 to 2016	Percent Change (%)
<b>Total 12-county metro area</b>	<b>1,307,000</b>	<b>1,598,000</b>	<b>291,000</b>	<b>22</b>
Harris County	1,020,000	1,206,000	186,000	18
Fort Bend County	142,000	206,000	64,000	45
Montgomery County	55,000	76,000	21,000	38
Brazoria County	38,000	45,000	7,000	18
Galveston County	27,000	33,000	6,000	22
Liberty County	5,000	8,000	3,000	60
Waller County	6,000	8,000	2,000	33
Matagorda County	3,000	5,000	2,000	67
Wharton County	4,000	4,000	0	0
Austin County	3,000	3,000	0	0
Chambers County	2,000	2,000	0	0
Colorado County	2,000	2,000	0	0

*Notes:* Because of differences in geographic boundaries and data years, the figures shown in this table may not match totals for the Houston metropolitan area overall. This study describes the Houston metropolitan area as comprised of 12 counties, based on the boundaries used by the ACS. The figures for 2010 represent a three-year average of ACS data (2008–10), pooled to increase accuracy.

*Sources:* U.S. Census Bureau, “American FactFinder—C05002: Place of Birth by Citizenship Status—2008–10 American Community Survey 3-Year Estimates,” accessed August 4, 2018, <https://factfinder.census.gov/>; U.S. Census Bureau, “American FactFinder—K200503: Place of Birth in the United States—2016 American Community Survey 1-Year Estimates,” accessed August 4, 2018, <https://factfinder.census.gov/>.

## **B. Most Common Countries of Origin**

Immigrants from Mexico and Central America accounted for slightly more than half of the Houston area’s foreign-born population in 2017. As in previous years, Mexico remained the top origin country, accounting for 38 percent of all immigrants in Houston: 612,000 out of 1.6 million (see Table 2). And while the number of Mexican immigrants grew by 2 percent between 2010 and 2017, this growth slowed in recent years and between 2016 and 2017 the number fell by 4 percent (not shown in table).<sup>34</sup>

Some other origin groups grew much more rapidly. The fastest growing immigrant populations were Cubans and Venezuelans—two groups that include large shares of asylum seekers—each of which more than tripled in size from 2010 to 2017. The Nigerian population also grew rapidly, more than doubling. Looking at broader regions of origin, African immigrants had the highest growth rate (82 percent) but were still a relatively small group of just 95,000 people in 2017, or 6 percent of the total Houston immigrant population.

The Northern Triangle of Central America represents another important region of origin for immigrants in the Houston area. Combined, the 246,000 immigrants from El Salvador, Guatemala, and Honduras made up 15 percent of the Houston foreign-born population. Over the 2010–17 period, the Honduran-born population grew the fastest (59 percent), followed by the Guatemalan and Salvadoran born (42 percent and 22 percent, respectively). Overall, the Central American immigrant population in the area grew by 34 percent from 2010 to 2017.

<sup>34</sup> Nationwide, the number of Mexican immigrants fell by 2 percent from 2016 to 2017, while the total foreign-born population rose by 2 percent. See U.S. Census Bureau, “American FactFinder—B05006: Place of Birth for the Foreign-Born Population in the United States—2010, 2016, and 2017 American Community Survey 1-Year Estimates,” accessed September 14, 2018, <https://factfinder.census.gov/>.





The Asian immigrant population grew by 29 percent during this period, and in 2017, there were 410,000 Asian immigrants in the Houston area, representing one-quarter of its total foreign-born population. Substantial numbers came from India, Vietnam, China, the Philippines, Pakistan, Korea, and Taiwan. Some groups of Asian immigrants (including those from India, China, the Philippines, and Pakistan) grew relatively rapidly, while others (e.g., those from Vietnam, Korea, and Taiwan) grew more slowly in the 2010–17 period (for a longer list of origin countries, see Appendix A).

**Table 2. Top 20 Origin Countries of the Houston Metropolitan Area Foreign-Born Population, 2010 and 2017**

		2010	2017	Change 2010 to 2017	Percent Change (%)
	<b>Total immigrants from all countries</b>	<b>1,332,000</b>	<b>1,629,000</b>	<b>298,000</b>	<b>22</b>
1	Mexico	601,000	612,000	11,000	2
2	El Salvador	106,000	129,000	23,000	22
3	India	60,000	93,000	33,000	54
4	Vietnam	80,000	91,000	11,000	13
5	Honduras	44,000	70,000	26,000	59
6	China*	36,000	48,000	12,000	32
7	Guatemala	33,000	47,000	14,000	42
8	Nigeria	17,000	41,000	24,000	139
9	Philippines	26,000	38,000	12,000	45
10	Cuba	11,000	36,000	25,000	223
11	Pakistan	23,000	34,000	11,000	49
12	Venezuela	10,000	33,000	23,000	223
13	Colombia	17,000	26,000	9,000	52
14	United Kingdom**	18,000	24,000	6,000	37
15	Canada	12,000	18,000	6,000	47
16	Korea	13,000	14,000	1,000	10
17	Taiwan	11,000	12,000	1,000	12
18	Iran	9,000	11,000	2,000	31
19	Peru	6,000	11,000	5,000	80
20	Germany	8,000	8,000	0	-7

\* China excludes Hong Kong and Taiwan.

\*\* United Kingdom includes crown dependencies.

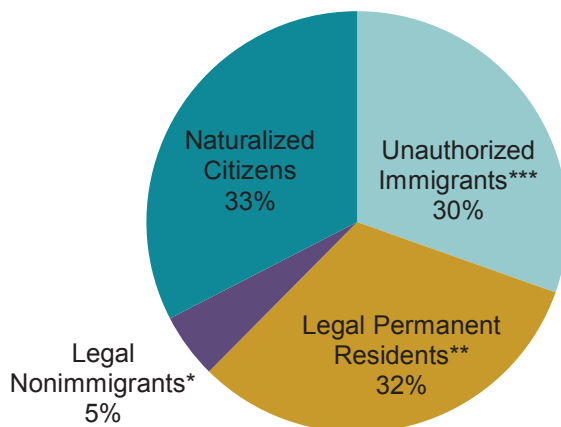
*Notes:* These data are for the official Houston metropolitan area, as defined by the U.S. Census Bureau, and not the 12-county area defined by the boundaries in the ACS microdata used for other tables in this report. Percent changes are based on unrounded numbers. For a more complete list of Houston immigrants' origin countries, see Appendix A.

*Source:* U.S. Census Bureau, "American FactFinder—B05006: Place of Birth for the Foreign-Born Population in the United States—2010 and 2017 American Community Survey 1-Year Estimates," accessed September 14, 2018, <https://factfinder.census.gov/>.

## IV. Immigrants by Citizenship and Legal Status

The Houston area's foreign-born population is made up of roughly equal shares of immigrants who are naturalized U.S. citizens, legal permanent residents (LPRs, also known as green-card holders), and unauthorized immigrants (see Figure 2). Out of a total of 1.66 million foreign-born Houston residents,<sup>35</sup> 541,000 were naturalized citizens and 531,000 were LPRs.<sup>36</sup>

**Figure 2. Legal Status of the Houston Metropolitan Area Foreign-Born Population, 2012–16**



\* Legal nonimmigrants are temporary-visa holders such as international students, H-1B high-skilled workers, and H-2A low-skilled agricultural workers; short-term visitors such as tourists are not included.

\*\* Legal permanent residents are also known as green-card holders.

\*\*\* Unauthorized immigrants include those who entered the country illegally as well as those who overstayed their visas. Also included in this group are DACA recipients, TPS holders, and some asylum applicants.

Note: These data are for the 12-county Houston metropolitan area, based on ACS boundaries.

Source: Migration Policy Institute (MPI) analysis of pooled 2012–16 ACS data and 2008 Survey of Income and Program Participation (SIPP) data, with legal status assignments by James Bachmeier of Temple University and Jennifer Van Hook of Pennsylvania State University.

MPI estimates that 506,000 unauthorized immigrants lived in the Houston area in 2016, representing 30 percent of all immigrants and 7.5 percent of the overall resident population of 6.8 million.<sup>37</sup> As is the case nationwide, these unauthorized immigrants include some who entered the United States illegally, usually by crossing the border with Mexico, as well as others who had valid visas but overstayed them or otherwise violated the terms of their admission. The unauthorized immigrant population also includes all DACA recipients and TPS holders, and some asylum applicants. Compared to an earlier MPI estimate of the unauthorized population in Houston (407,000 individuals in 2014), this 2016

<sup>35</sup> The total number of immigrants in the MPI analysis of ACS data is 4 percent higher than the official Census Bureau estimate based on the 2016 ACS (1.59 million for the Houston metropolitan area) because MPI assumes that some unauthorized immigrants are not counted in Census surveys. Additionally, the MPI analysis pools five years of ACS data (2012–16), while the 2016 estimate shown earlier is based on single-year 2016 ACS data. Throughout, the text of this report refers to data year 2016, which generally includes the five-year pooled sample of ACS data.

<sup>36</sup> Nationwide, about two-thirds of legal permanent residents (LPRs) are sponsored by family members (spouses, parents, children, or siblings), while the remaining third are admitted as refugees or asylees, based on offers of employment, or through the diversity lottery program. See U.S. Department of Homeland Security (DHS), Office of Immigration Statistics, "Table 6. Persons Obtaining Lawful Permanent Resident Status By Type And Major Class Of Admission: Fiscal Years 2014 To 2016" (dataset from the *2016 Yearbook of Immigration Statistics*, DHS, Washington, DC, December 28, 2017), [www.dhs.gov/immigration-statistics/yearbook/2016/table6](http://www.dhs.gov/immigration-statistics/yearbook/2016/table6). After five years in LPR status—or three years, if married to a U.S. citizen—an LPR is eligible to naturalize.

<sup>37</sup> This population is higher than the official Census Bureau estimate of 6.9 million in 2016, because it is an average of the total population across a five-year period (2012–16) during which the total population grew quickly.



estimate represents an increase of about 25 percent—a higher growth rate than that of the overall Houston immigrant population (19 percent).<sup>38</sup>

The subsections that follow examine how immigrants with different legal statuses living in the Houston metropolitan area compare in terms of key socioeconomic indicators. This comparison sheds light on important differences within the Houston immigrant population. This analysis is mostly descriptive in nature and does not analyze the structural factors behind the demographic differences between groups of immigrants. The next section of the report will then take a closer look at three groups that intersect with the unauthorized population and who have been particularly affected by national immigration policy changes under the Trump administration: DACA beneficiaries, TPS holders, and asylum seekers.<sup>39</sup>

## A. Geographic Distribution of Unauthorized and Legal Immigrants

Of the area's estimated 506,000 unauthorized immigrants, 81 percent lived in Harris County in 2016 (see Table 3). Within Harris County, 32 percent of immigrants were unauthorized, a share slightly above the Houston metro area average of 30 percent. The concentration of unauthorized immigrants in Harris County (as well as its large overall foreign-born population) means that demand is high in the county for immigration legal services, including those that offer assistance with DACA renewals and deportation defense.

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*Within Harris County, 32 percent of immigrants were unauthorized, a share slightly above the Houston metro area average of 30 percent.*

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Unauthorized immigrants comprised smaller shares of the immigrant populations in Fort Bend and Brazoria Counties, but larger shares in Montgomery County and the smaller, outlying suburban counties. By contrast, immigrants in Fort Bend and Brazoria Counties were more likely to be naturalized citizens and less likely to be unauthorized than in other parts of the metro area. This pattern may reflect the fact that both counties had relatively high shares of Asian immigrants and lower shares of Latino immigrants, as Asian immigrants are less likely to be unauthorized and more likely to be citizens.

38 MPI includes TPS holders in its unauthorized estimate for 2016; they were excluded in 2012. TPS holders amounted to 4 percent of the unauthorized (21,000 out of 506,000) in the Houston area in 2016. See Randy Capps, Michael Fix, and Chiamaka Nwosu, *A Profile of Immigrants in Houston, the Nation's Most Diverse Metropolitan Area* (Washington, DC: MPI, 2015), [www.migrationpolicy.org/research/profile-immigrants-houston-nations-most-diverse-metropolitan-area](http://www.migrationpolicy.org/research/profile-immigrants-houston-nations-most-diverse-metropolitan-area).

39 Examination of these three groups is important to understanding of the unauthorized population both because they often share origin countries and socioeconomic characteristics, and because many immigrants in these groups may become unauthorized if DACA ends, their countries are no longer designated for TPS, or their asylum claims are rejected.

**Table 3. Houston Metropolitan Area Foreign-Born Population, by Immigration Status and County, 2012–16**

	Total Foreign Born	Naturalized Citizens	Legal Permanent Residents	Legal Nonimmigrants	Unauthorized Immigrants	Unauthorized Share of the Foreign Born (%)
<b>Total 12-county metro area</b>	<b>1,662,000</b>	<b>541,000</b>	<b>531,000</b>	<b>83,000</b>	<b>506,000</b>	<b>30</b>
Harris County	1,276,000	379,000	424,000	61,000	412,000	32
Fort Bend County	199,000	100,000	49,000	15,000	36,000	18
Montgomery, Chambers, and Liberty Counties	86,000	24,000	27,000	5,000	29,000	34
Brazoria County	48,000	21,000	14,000	< 2,000	11,000	23
Galveston County	32,000	12,000	10,000	< 2,000	10,000	31
Austin, Matagorda, Waller, Wharton, and Colorado Counties	20,000	5,000	7,000	< 2,000	8,000	40

*Notes:* Counties are grouped according to boundaries used in the ACS public use data. The total foreign-born population shown here may exceed official U.S. Census Bureau estimates based on ACS data, because these estimates undercounted immigrants. These totals may also differ from those given in other tables in this report because they use five-year pooled data, not a single-year sample for 2016. Populations of less than 2,000 are not displayed because estimates of small populations have high margins of error.

*Source:* MPI analysis of pooled 2012–16 ACS data and 2008 SIPP data, with legal status assignments by Bachmeier and Van Hook.

## **B. National Origins**

Compared to the diversity of Houston’s overall immigrant population, unauthorized immigrants come from a narrower set of countries. In the Houston area, as nationally, unauthorized immigrants are predominantly from Mexico and Central America. In 2016, 78 percent of the Houston area’s unauthorized population was born in Mexico, El Salvador, Guatemala, or Honduras (see Table 4). This share is higher than the same figure for unauthorized immigrants nationwide (66 percent), a difference that may be due to Houston’s proximity to the U.S.-Mexico border and that suggests a relatively high share of immigrants who crossed the border illegally rather than overstayed a visa. Nationwide, immigrants who overstayed a visa comprise an estimated 42 percent of the unauthorized population, and that share has been rising as overstay have outnumbered illegal border crossings since 2007.<sup>40</sup>

This distinction between border crossers and visa overstay has implications for an immigrant’s future legal immigration options. Unauthorized immigrants are barred from legal admission to the United States for certain periods of time, but there are more exceptions to these bars for those who have overstayed a

<sup>40</sup> Robert Warren and Donald Kerwin, “The 2,000 Mile Wall in Search of a Purpose: Since 2007 Visa Overstay Have Outnumbered Undocumented Border Crossers by a Half Million,” *Journal on Migration and Human Security* 5, no. 1 (2017): 124–36.



visa than there are for those who have crossed the U.S. border illegally.<sup>41</sup> Thus, opportunities to adjust to legal status are generally more limited for Mexican and Central American unauthorized immigrants, most of whom crossed into the United States illegally, than for other unauthorized populations comprised mainly of visa overstayers.

**Table 4. Top Origin Countries of the Unauthorized Immigrant Population in the Houston Metropolitan Area, 2012–16**

	Origin Country	Number of Unauthorized Immigrants	Share of the Unauthorized Population (%)
	<b>Total all countries</b>	<b>506,000</b>	<b>100.0</b>
1	Mexico	290,000	57.3
2	El Salvador	55,000	10.9
3	Honduras	31,000	6.1
4	Guatemala	20,000	4.0
5	Vietnam	11,000	2.3
6	India	11,000	2.3
7	China	9,000	1.8
8	Philippines	8,000	1.5
9	Nigeria	7,000	1.4
10	Colombia	6,000	1.2
11	Pakistan	5,000	1.1
12	Venezuela	4,000	0.7
13	Nicaragua	3,000	0.5
14	United Kingdom	2,000	0.5
15	Peru	2,000	0.4
16	Korea	2,000	0.4

*Notes:* This table shows only populations of more than 2,000 because estimates of small populations have high margins of error. These data are for the 12-county Houston metropolitan area, based on ACS boundaries.

*Source:* MPI analysis of 2012–16 ACS data (pooled) and 2008 SIPP, with legal status assignments by Bachmeier and Van Hook.

### C. Family Structure

Many unauthorized immigrants live in mixed-status families with LPR or U.S.-citizen relatives. In 2016, 20 percent of unauthorized adults (age 15 and older) in Houston were married to either a green-card holder or U.S. citizen, as shown in Table 5. Another 26 percent were married to either another unauthorized immigrant or, in a small number of cases, a legal noncitizen (e.g., an international student or temporary worker).

Marriage to a U.S. citizen is the quickest pathway to a green card for any noncitizen. For some unauthorized immigrants—those who have overstayed a visa or are able to prove that their absence

<sup>41</sup> In order to apply for LPR status, unauthorized immigrants who have been in the United States for at least six months must leave the country and wait either three or ten years (depending on their length of stay in the country) before their applications for permanent residency may be accepted. There are exceptions for some immigrants who overstayed their visas—as opposed to those who crossed into the United States illegally—and for a small number of other unauthorized immigrants who can show that their absence would cause extreme hardship to U.S.-citizen or LPR family members. See American Immigration Council, *The Three- and Ten-Year Bars: How New Rules Expand Eligibility for Waivers* (Washington, DC: American Immigration Council, 2016), [www.americanimmigrationcouncil.org/sites/default/files/research/three\\_and\\_ten\\_year\\_bars.pdf](http://www.americanimmigrationcouncil.org/sites/default/files/research/three_and_ten_year_bars.pdf).



would cause a U.S.-citizen or LPR family member extreme hardship—it may also allow them to adjust their status without leaving the country and spending often lengthy wait times abroad.

**Table 5. Marital Status and Spouse’s Immigration Status for Unauthorized Immigrants (age 15 and over) in the Houston Metropolitan Area, 2012–16**

	Number of Unauthorized Immigrants	Share of Total (%)
<b>Total population (age 15 or over)</b>	<b>472,000</b>	<b>100</b>
Married to a U.S. citizen	59,000	12
Married to a legal permanent resident (LPR)	39,000	8
Married to an immigrant who is not a U.S. citizen or LPR*	122,000	26
Never married	169,000	36
Divorced, separated, or widowed	83,000	18

\* Almost all noncitizen/non-LPR spouses of unauthorized immigrants are also unauthorized. Fewer than 2,000 are legal nonimmigrants.

Note: These data are for the 12-county Houston metropolitan area, based on ACS boundaries.

Source: MPI analysis of pooled 2012–16 ACS data and 2008 SIPP data, with legal status assignments by Bachmeier and Van Hook.

Of the estimated 98,000 unauthorized immigrants in the Houston metropolitan area married to a U.S. citizen or LPR,<sup>42</sup> it is likely that many would not be able to qualify for a green card without first leaving the country because they entered illegally and do not qualify for a hardship exemption. Moreover, the Trump administration is in the process of developing a “public charge” rule that would bar potential immigrants from entering the country and restrict the ability of those already present to adjust their legal status if they or their dependent family members (including U.S.-citizen spouses and children) have used public benefits, such as cash welfare, food stamps, or Medicaid. Among the broader noncitizen population this public-charge rule would likely affect, some unauthorized immigrants married to U.S. citizens or LPRs, or who have U.S.-citizen or LPR children, may find it even more difficult in the future to adjust their status to become LPRs. Unauthorized immigrants are generally not eligible for public benefits; however, many live in families with U.S. citizens or LPRs whose use of such benefits could exclude them from adjusting their status, even if they leave the country for an extended period.<sup>43</sup>

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*In 2016, according to MPI estimates, 768,000 children in the Houston area had at least one immigrant parent, comprising 44 percent of all children in the area.*

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In addition to mixed-status families in which spouses have different legal statuses, it is also common for immigrant parents (including those who are unauthorized) and their children to have different legal statuses. In 2016, according to MPI estimates, 768,000 children in the Houston area had at least one

42 Of these, 76,000 lived in Harris County, and 10,000 lived in Fort Bend County, with the remaining 12,000 living in other counties in the area.

43 Unauthorized immigrants are ineligible for most public benefits, but there are no eligibility bars for their U.S.-citizen or LPR spouses and children. Because many unauthorized immigrants have family incomes below the poverty level, this makes their spouses and children income-eligible for benefit programs. See Jeanne Batalova, Michael Fix, and Mark Greenberg, *Chilling Effects: The Expected Public Charge Rule and Its Impact on Legal Immigrant Families’ Public Benefits Use* (Washington, DC: MPI, 2018), [www.migrationpolicy.org/research/chilling-effects-expected-public-charge-rule-impact-legal-immigrant-families](http://www.migrationpolicy.org/research/chilling-effects-expected-public-charge-rule-impact-legal-immigrant-families).





immigrant parent, comprising 44 percent of all children in the area (see Table 6).<sup>44</sup> Of these children of immigrants, approximately one-third had at least one unauthorized immigrant parent.

**Table 6. Children under Age 18 in the Houston Metropolitan Area, by Parental Citizenship and Immigration Status, 2012–16**

	Number of Children	Share of Total (%)
<b>Total children under 18 with parents in the home</b>	<b>1,752,000</b>	<b>100</b>
U.S.-born parents only	974,000	56
At least one foreign-born parent	768,000	44
One or more naturalized-citizen parents (no noncitizen parents)	199,000	11
One or more legal noncitizen parents (no unauthorized parents)	311,000	18
One or more unauthorized parents	258,000	15

*Notes:* Children without parents in the home are excluded. Legal noncitizens include both legal permanent residents (LPRs, also known as green-card holders) and nonimmigrants, such as international students and temporary workers. These data are for the 12-county Houston metropolitan area, based on ACS boundaries.

*Source:* MPI analysis of pooled 2012–16 ACS data and 2008 SIPP data, with legal status assignments by Bachmeier and Van Hook.

Eighty-six percent of children of immigrants in Houston were U.S. citizens, as were 80 percent of children of unauthorized immigrants—a pattern similar to the one seen at the national level. But even within the same family, children may have different legal statuses; in many unauthorized immigrant families, for example, the older children are unauthorized while the younger children are U.S. citizens.<sup>45</sup> Nationally, 40 percent of adolescent children (ages 15 to 17) with unauthorized parents are unauthorized themselves, compared to less than 10 percent of those under age 5.

#### **D. Educational Attainment**

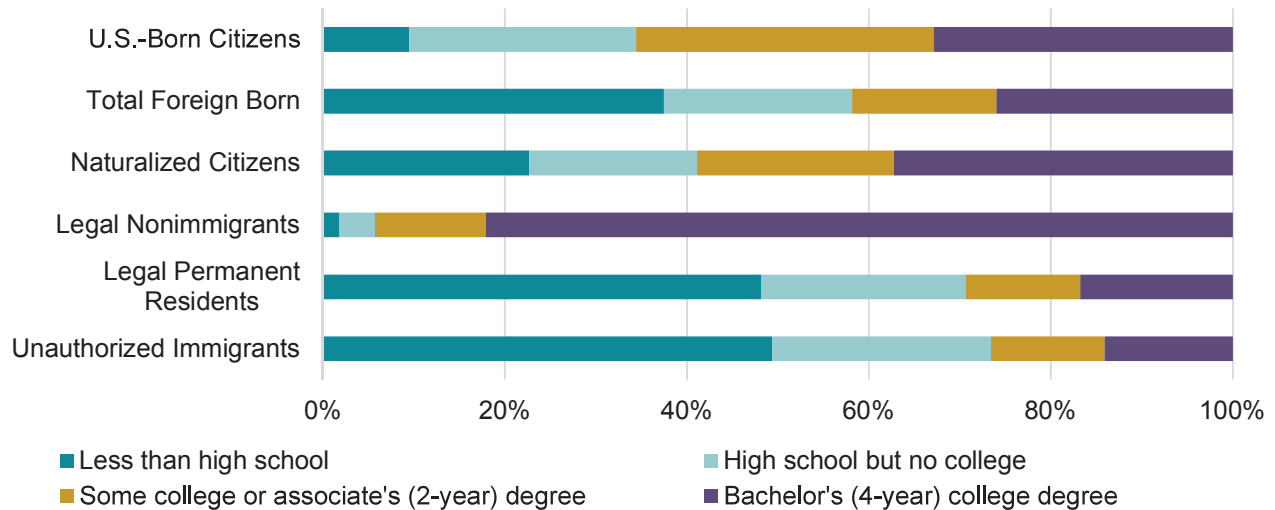
Immigrants in the Houston area with different immigration statuses tend also to have different levels of education. LPRs and unauthorized immigrants in the area have roughly equivalent educational attainment, though this level is, on average, lower than that of citizens, both naturalized and the U.S. born. In 2016, about half of LPRs and unauthorized immigrants lacked a high school education, compared with 23 percent of naturalized citizens and just 10 percent of U.S.-born adults age 25 and over (see Figure 3). Nonetheless, more than one-quarter of both LPRs and unauthorized immigrants had at least some college education, as did 59 percent of naturalized citizens and 66 of the native born. More than 80 percent of legal nonimmigrants had a four-year college degree, reflecting the fact that many were graduate students, H-1B workers (who are required by law to have at least a four-year degree), or other high-skilled workers.

<sup>44</sup> The Census Bureau's official estimate of children with immigrant parents in the Houston metropolitan area, based on the 2012-16 ACS (pooled), is 728,000, or 5 percent lower than MPI's estimate of 768,000. MPI's estimate incorporates unauthorized immigrants who were potentially undercounted in the ACS. See U.S. Census Bureau, "American FactFinder—B05006."

<sup>45</sup> Randy Capps, Michael Fix, and Jie Zong, *A Profile of U.S. Children with Unauthorized Immigrant Parents* (Washington, DC: MPI, 2016), [www.migrationpolicy.org/research/profile-us-children-unauthorized-immigrant-parents](http://www.migrationpolicy.org/research/profile-us-children-unauthorized-immigrant-parents).



**Figure 3. Educational Attainment of Houston Metropolitan Area Residents (age 25 and over), by Immigration Status, 2012–16**



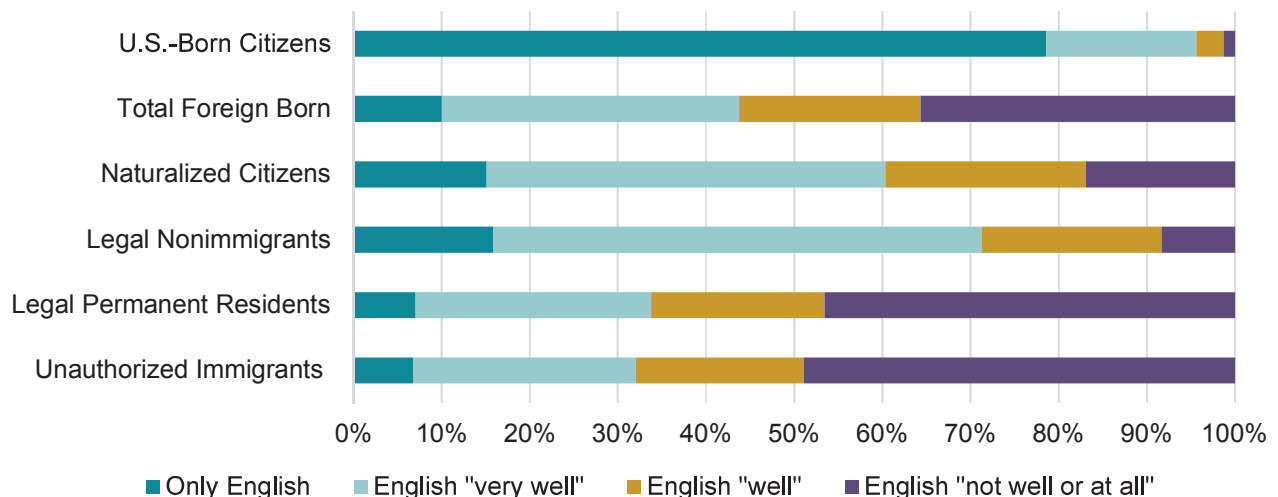
*Note:* These data are for the 12-county Houston metropolitan area, based on ACS boundaries.

*Source:* MPI analysis of pooled 2012–16 ACS data and 2008 SIPP data, with legal status assignments by Bachmeier and Van Hook.

### E. English Proficiency and Bilingualism

As with educational attainment, there is variation among Houston immigrants in terms of English proficiency. LPRs and unauthorized immigrants have similar levels of proficiency: as of 2016, about half of each group spoke English less than very well—a level the U.S. Census Bureau describes as limited English proficient (LEP) (see Figure 4). Despite their much higher levels of formal education, substantial shares of legal nonimmigrants (29 percent) and naturalized citizens (40 percent) were also LEP. With large numbers of LEP immigrants in Houston—including an estimated 340,000 unauthorized immigrants and 350,000 green-card holders—demand is high for interpretation and translation, particularly among noncitizens seeking immigration legal services.

**Figure 4. English Proficiency of Houston Metropolitan Area Residents (age 5 and over), by Immigration Status, 2012–16**



*Note:* These data are for the 12-county Houston Metropolitan Area, based on ACS boundaries.

*Source:* MPI analysis of pooled 2012–16 ACS data and 2008 SIPP data, with legal status assignments by Bachmeier and Van Hook.





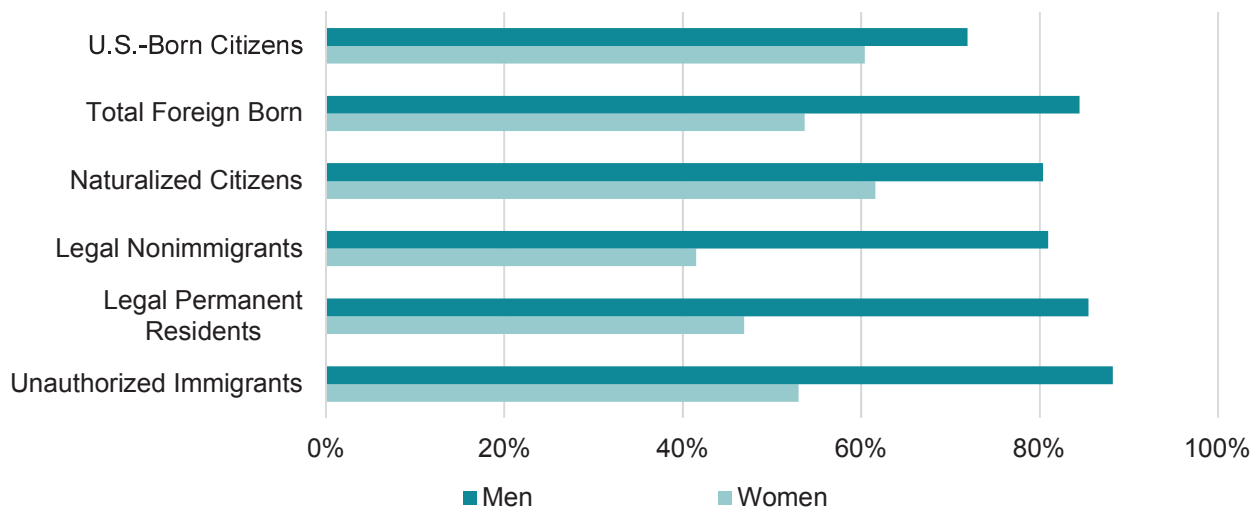
Houston is also home to a large bilingual population, with a total of 1.3 million residents speaking a language other than English at home and also speaking English very well as of 2016. Even among U.S.-born citizens, 21 percent were bilingual—many likely as a result of being the children of immigrants.

## F. Labor-Force Participation

In Houston, as nationally, foreign-born men are more likely to work than U.S.-born men, while the reverse is true for women. In 2016, unauthorized immigrant men had the highest labor-force participation rate of any group of adults (age 16 and over): 88 percent (see Figure 5). Men who held green cards, were naturalized citizens, or legal nonimmigrants had slightly lower rates of between 80 percent and 85 percent. By comparison, 72 percent of U.S.-born men were in the labor force. The slightly lower rates among naturalized and U.S.-born citizen men are a reflection of the fact that these groups are made up of larger shares of individuals age 55 and over, many of whom are likely to be retired.

Among women, U.S.-born and naturalized citizens had the highest labor-force participation of any group, at about 60 percent each in 2016. Participation was lowest among legal nonimmigrants (42 percent) and unauthorized immigrants (53 percent). The low rate among legal nonimmigrant women may reflect the fact that many are either students or dependents of H-1B holders or other temporary workers, and as such not allowed to work,<sup>46</sup> while among LPR and unauthorized immigrant women it may reflect the choices of families who have children but cannot afford child care outside the home.<sup>47</sup>

**Figure 5. Labor-Force Participation of Houston Metropolitan Area Residents (age 16 and over), by Immigration Status and Gender, 2012–16**



*Notes:* Active-duty members of the military are excluded. These data are for the 12-county Houston metropolitan area, based on ACS boundaries.

*Source:* MPI analysis of pooled 2012–16 ACS data and 2008 SIPP data, with legal status assignments by Bachmeier and Van Hook.

<sup>46</sup> Some legal nonimmigrants are students and not allowed to work under U.S. immigration law, while others such as H-1B workers are brought in on visas for specific jobs. Still others may be the dependent family members of H-1B holders and other workers, who are also ineligible to work. Men are more likely to be the principal visa holders (i.e., the workers) in H-1B and other temporary-worker families, while women are more likely accompany them as dependents.

<sup>47</sup> National Academies of Sciences, Engineering, and Medicine, *The Integration of Immigrants into American Society*, eds. Mary C. Waters and Marisa Gerstein Pineau (Washington, DC: National Academies Press, 2015), [www.nap.edu/catalog/21746/the-integration-of-immigrants-into-american-society](http://www.nap.edu/catalog/21746/the-integration-of-immigrants-into-american-society); Hirokazu Yoshikawa, *Immigrants Raising Citizens: Undocumented Parents and Their Young Children* (New York: Russel Sage Foundation, 2012).

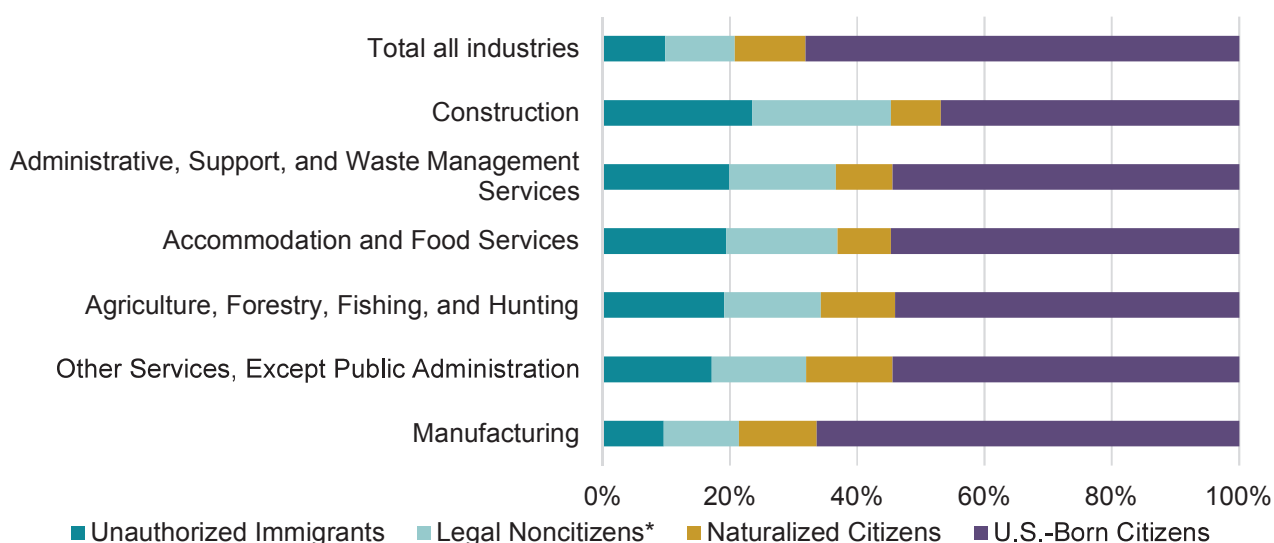
For immigrant men in the labor force, unemployment rates were low in Houston (less than 5 percent as of 2016). The rate was slightly higher for U.S.-born men, at 7 percent.<sup>48</sup> By contrast, unemployment was higher for immigrant women, at more than 8 percent, than for U.S.-born women (7 percent).

## G. Industries of Employment

In 2016, 32 percent of Houston metro area workers were immigrants. Unauthorized immigrants comprised 10 percent of all workers, a share higher than their proportion of the Houston population (8 percent). Legal noncitizens—including both LPRs and nonimmigrants, such as H-1B workers—also comprised a larger share of workers (11 percent) than of the population (9 percent).

In some industries, the immigrant share of workers was even higher. Unauthorized immigrants alone comprised 24 percent of all Houston construction workers, and legal noncitizens comprised another 22 percent; this was the most common industry of employment for both groups (see Figure 6). A total of about 161,000 foreign-born workers held construction jobs in the Houston area in 2016, making them both a large share of the industry’s workforce and an important resource in efforts to rebuild damaged homes, businesses, and infrastructure in the wake of Hurricane Harvey.

**Figure 6. Houston Metropolitan Area Residents (age 16 and over) Employed in Select Major Industries, by Immigration Status, 2012–16**



*Notes:* Legal noncitizens include both LPRs and nonimmigrants such as H-1B workers; more than 90 percent of immigrants in this category are LPRs. Active-duty members of the military are excluded. These data are for the 12-county Houston metropolitan area, based on ACS boundaries. For a more detailed breakdown of employment by industry and legal status, see Appendix B.

*Source:* MPI analysis of pooled 2012–16 ACS data and 2008 SIPP data, with legal status assignments by Bachmeier and Van Hook.

Other industries with high concentrations of unauthorized immigrant and legal noncitizen workers included administrative support occupations; accommodation and food services; and agriculture, forestry, fishing, and hunting.<sup>49</sup> Unauthorized immigrants were underrepresented in industries such as corporate management, public administration, finance and insurance, and education services, many

<sup>48</sup> These are average unemployment rates based on five-year pooled ACS data (2012–16), and they include a period when unemployment was relatively high in Houston due to a downturn in the oil and gas industry. Unemployment rates have likely fallen substantially since the time these data were collected.

<sup>49</sup> However, it should be noted that relatively few Houston residents of any immigration status were employed in agriculture, forestry, fishing, and hunting—12,000 in all.



of which require professional licenses or training that may be difficult for unauthorized workers to obtain.<sup>50</sup> (For a more detailed breakdown of employment by industry and legal status, see Appendix B.)

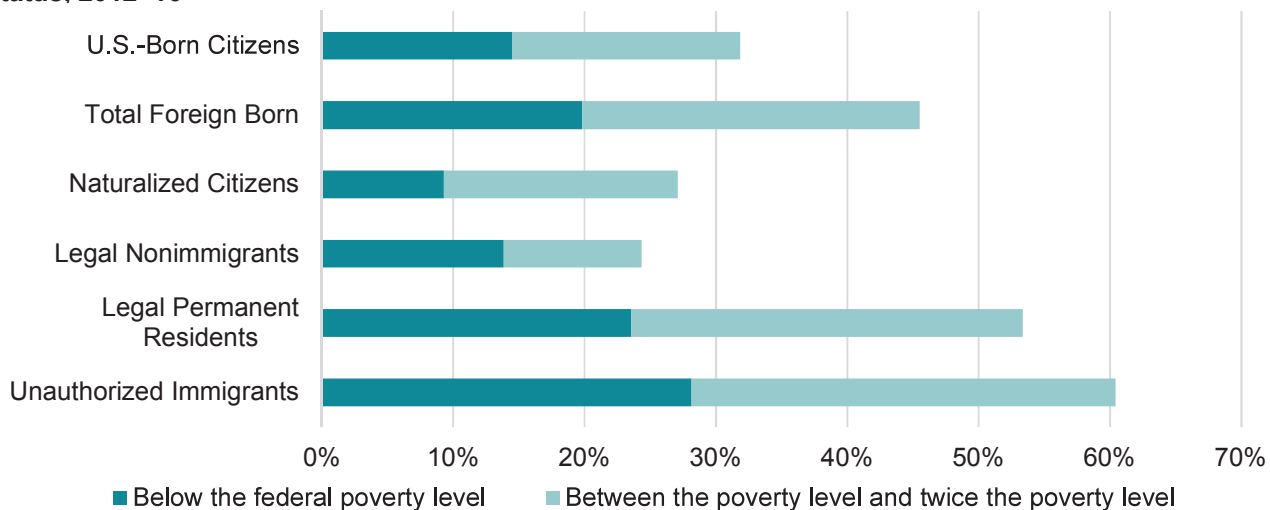
Legal noncitizens living in the Houston metropolitan area were similarly distributed across industries, but they were somewhat better represented in fields that require certifications or training, such as mining; management; finance and insurance; educational services; health care and social assistance; and professional, scientific, and technical services. Four industries had substantial numbers of H-1B and other nonimmigrant workers (more than 5,000 each): professional, scientific, and technical services; manufacturing; mining, quarrying, and oil and gas extraction; and educational services.

## H. Poverty Levels

In Houston, immigrants are substantially more likely to be poor than U.S.-born residents, but this poverty is concentrated among certain noncitizen groups. In 2016, 14 percent of the U.S.-born population had incomes below the federal poverty level, and 31 percent had incomes below twice the poverty level (see Figure 7).<sup>51</sup> The poverty rate was lower for naturalized citizens (9 percent), likely a function of their older average age, greater labor-market experience, and higher earnings. Legal nonimmigrants had a poverty rate of 14 percent, roughly the same as that of the U.S. born.<sup>52</sup>

By contrast, unauthorized immigrants and green-card holders in Houston had considerably higher poverty rates, at 28 percent and 24 percent, respectively. And more than half of unauthorized immigrants and LPRs had incomes below twice the poverty level (about \$48,000 for a family of four, as of 2016). High poverty levels among these noncitizens mean that many are unable to afford attorneys to help them navigate immigration processes, generating substantial demand for pro bono and subsidized legal services.

**Figure 7. Share of Houston Metropolitan Area Residents with Poverty-Level Incomes, by Immigration Status, 2012–16**



*Notes:* Poverty levels are calculated for individuals based on family size and annual income. The federal poverty level was \$24,300 for a family of four in 2016, higher for larger families and lower for smaller ones. These data are for the 12-county Houston metropolitan area, based on ACS boundaries.

*Source:* MPI analysis of pooled 2012–16 ACS data and 2008 SIPP data, with legal status assignments by Bachmeier and Van Hook.

50 Overall, unauthorized immigrants represented less than 5 percent of workers in the following industries: management of companies and enterprises; public administration; finance and insurance; educational services; professional, scientific, and technical services; information; utilities; mining, quarrying, and oil and gas extraction; health care and social assistance.

51 The 2016 poverty rate for all Houston area residents was 15 percent, about the same as the national average, according to five-year pooled ACS data for 2012–16. See U.S. Census Bureau, “American FactFinder—S1701: Poverty Status in the Past 12 Months—2012–2016 American Community Survey Estimates,” accessed August 8, 2018, <https://factfinder.census.gov/>.

52 Legal nonimmigrants are a diverse group that includes students, many of whom are poor because they do not work while in school, as well as high-skilled workers such as H-1B holders employed in technical occupations and L-1 managers, who are unlikely to be poor.



## I. Home Ownership

Most immigrants in the Houston area own their own homes. As of 2016, 56 percent of all immigrants in the area lived in owned homes, not far behind the rate of 65 percent for the U.S.-born population (see Figure 8).<sup>53</sup> Despite recent increases in home prices, Houston ranked 39th in median home prices among the 100 largest U.S. metro areas—making homes in the area more affordable on average than those in many other large cities in both Texas and other major immigrant destination states such as California.<sup>54</sup>

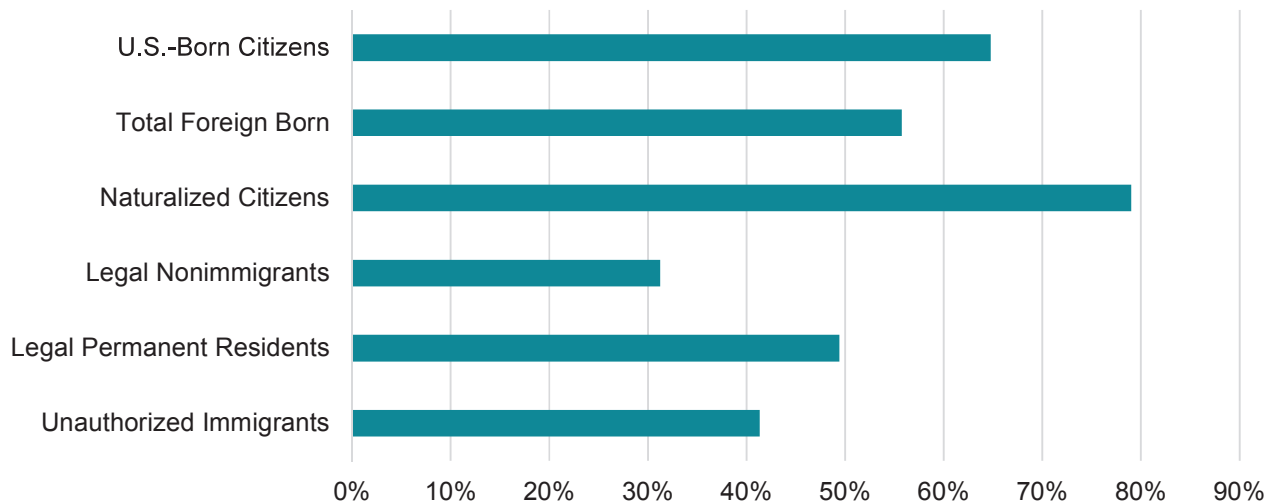
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*56 percent of all immigrants in the area lived in owned homes, not far behind the rate of 65 percent for the U.S.-born population.*

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Among immigrants in Houston, homeownership was highest for naturalized citizens (at 79 percent, a rate that outstrips that of the U.S. born). The rate was lower for green-card holders (49 percent) and unauthorized immigrants (41 percent), the latter likely a reflection of lower income levels. Nonetheless, some unauthorized immigrants do own their own homes—something more likely to be the case for those who have lived in the country for a long period of time.<sup>55</sup>

**Figure 8. Share of Houston Metropolitan Area Residents Living in Owned Homes, by Immigration Status, 2012–16**



Note: These data are for the 12-county Houston metropolitan area, based on ACS boundaries.

Source: MPI analysis of pooled 2012–16 ACS data and 2008 SIPP data, with legal status assignments by Bachmeier and Van Hook.

<sup>53</sup> Overall, 60 percent of Houston residents lived in owned homes, slightly below the U.S. average of 64 percent, which includes small cities and rural areas as well as larger urban centers. See U.S. Census Bureau, “American FactFinder—B25003: Tenure. Housing Estimates—2012–2016 American Community Survey Estimates,” accessed August 8, 2018, <https://factfinder.census.gov/>.

<sup>54</sup> Kiplinger, “Home Prices in the 100 Largest Metro Areas,” updated March 2018, [www.kiplinger.com/tool/real-estate/T010-S003-home-prices-in-100-top-u-s-metro-areas/index.php](http://www.kiplinger.com/tool/real-estate/T010-S003-home-prices-in-100-top-u-s-metro-areas/index.php).

<sup>55</sup> As of 2016, 62 percent of unauthorized immigrants residing in Houston had lived in the United States for at least ten years.



## V. Immigrants with Temporary Immigration Benefits

With the Trump administration's efforts to end DACA and TPS for some countries, and its changes to the U.S. asylum system, some immigrants living in Houston face considerable uncertainty about the future. Most unauthorized immigrants do not have a path to legal status—either because they do not have family members or employers who can sponsor them for a visa, or because of legal bars on their adjustment to LPR status as a result of illegal entry into the country. However, some who came to the United States as children have been able to access temporary protection from deportation through the DACA program, while other unauthorized immigrants from countries experiencing natural disaster or civil unrest have found it in the form of TPS. A subset of the TPS population may have held a visa at the time they applied for this status, but risk lapsing into unauthorized status should they lose this protection. A third group of immigrants—asylum seekers—have applied for humanitarian protection but may wait years for a decision in their case and more secure legal status, if the case is approved. Asylum seekers whose cases have not been decided within 180 days may apply for a work permit that enables them to seek legal employment while they wait for a judge to rule on their cases; however, unless asylum seekers have some other legal basis for being in the country, they are not considered legal immigrants until their applications have been approved.

These three populations can be described using a combination of ACS and U.S. government administrative data.<sup>56</sup> While they share some characteristics with the unauthorized population, members of these three groups often have work authorization, which allows them to obtain better-paid and higher-skilled jobs and to advance economically compared to the broader unauthorized population.

For service providers, understanding the make-up of these groups is particularly important as immigrants often require legal assistance to apply for protection initially, and in the case of DACA and TPS, to renew it. Legal aid and other similar organizations in Houston are likely to experience an increase in demand for services as the administration's policy changes take effect.

### A. DACA Recipients

In June 2012, the Obama administration announced Deferred Action for Childhood Arrivals (DACA), a program that offers a renewable two-year reprieve from deportation and work authorization to certain unauthorized immigrants who entered the United States as children. To qualify for DACA, unauthorized immigrants must:

- be at least 15 years old;
- have come to the United States before age 16;
- have continuously resided in the country since June 15, 2007;
- have been under the age of 31 as of June 15, 2012, and been physically present in the United States at that time;
- be enrolled in school, have graduated high school, have obtained a GED, or be discharged honorably from the armed forces; and
- have not been convicted of a felony, significant misdemeanor, or three or more other misdemeanors, or be a threat to national security or public safety.<sup>57</sup>

<sup>56</sup> These three groups are included in the unauthorized immigrant population totals presented earlier in the report, because they have national origins and other characteristics in common with the larger unauthorized population.

<sup>57</sup> USCIS, "Consideration of Deferred Action for Childhood Arrivals (DACA)—Guidelines," updated February 14, 2018, [www.uscis.gov/archive/consideration-deferred-action-childhood-arrivals-daca#guidelines](http://www.uscis.gov/archive/consideration-deferred-action-childhood-arrivals-daca#guidelines).





An estimated 77,000 unauthorized immigrants in the Houston area were potentially eligible for DACA, as of 2018 (see Table 7). Of these, 57,000 met all the eligibility criteria (marked “immediately eligible” in the table). Another 17,000 met all the criteria except school enrollment or a high-school degree and may qualify if they went back to school or enrolled in an adult education program that leads to a GED. A further 3,000 were under the age of 15 and would likely qualify in the future, when they reach that age.

As with the overall unauthorized population, most DACA-eligible immigrants lived in Harris County (82 percent), though Fort Bend and Montgomery Counties also had significant populations. In the other counties, there were fewer than 2,000 DACA-eligible immigrants.

**Table 7. Immigrants in the Houston Metropolitan Area Estimated to be Eligible for Deferred Action for Childhood Arrivals, 2018**

	Total potentially eligible	Immediately Eligible	Eligible but for Education	Eligible in the Future
<b>Total 12-county metro area</b>	<b>77,000</b>	<b>57,000</b>	<b>17,000</b>	<b>3,000</b>
Harris County	63,000	47,000	13,000	2,000
Fort Bend County	5,000	4,000	<2,000	<2,000
Montgomery, Chambers and Liberty counties	5,000	3,000	2,000	<2,000
Brazoria County	<2,000	<2,000	<2,000	<2,000
Galveston County	<2,000	<2,000	<2,000	<2,000
Austin, Matagorda, Waller, Wharton, and Colorado counties	<2,000	<2,000	<2,000	<2,000

*Notes:* Counties are grouped according to boundaries provided in the ACS public use data. “Immediately eligible” immigrants met all DACA eligibility criteria, those in the “but for education” category met all criteria except school enrollment or a high-school degree or equivalent, and immigrants “eligible in the future” were younger than the program’s minimum age of 15. Eligibility due to adult-education program enrollment and ineligibility due to criminal history or lack of continuous U.S. presence were not modeled due to lack of data. To capture the population eligible for DACA as of 2018 using 2016 ACS data, otherwise eligible 13- and 14-year-olds are included in the “immediately eligible population” rather than the “eligible in the future” population, assuming they remained enrolled in school (i.e., they were assumed to be two years older and still in school in 2018). Using high school dropout rates for DACA-eligible youth (ages 16 to 24), 14 percent of immediately-eligible 16- and 17-year-olds from the 2016 ACS data were shifted from the “immediately eligible” to the “eligible but for education” group as immigrants who have dropped out of high school do not qualify for DACA unless they enroll in a qualifying adult-education program. More precise figures are not shown for populations of less than 2,000 due to high margins of error in estimating small populations.

*Source:* MPI analysis of pooled 2012–16 ACS data and 2008 SIPP data, with legal status assignments by Bachmeier and Van Hook.

According to U.S. Citizenship and Immigration Services (USCIS), the Houston metropolitan area had almost 36,000 DACA recipients as of July 31, 2018. This represents 63 percent of the 57,000 unauthorized immigrants MPI estimated were immediately eligible, and 49 percent of those eligible on all counts except education are included (an additional 17,000 people). Houston was home to about 5 percent of DACA recipients nationwide (a total population of 704,000), ranking fifth among metro areas in terms of the size of its DACA population after Los Angeles, New York, Dallas, and Chicago.<sup>58</sup>

In September 2017, the Trump administration announced the rescission of the DACA program, stating that new applications would no longer be accepted, effective immediately, and renewal applications would be accepted for a limited period after the announcement.<sup>59</sup> However, a series of federal court cases

<sup>58</sup> USCIS, “Approximate Active DACA Recipients: Core Based Statistical Area” (dataset, July 31, 2018), [www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/DACA\\_Population\\_Data\\_July\\_31\\_2018.pdf](http://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/DACA_Population_Data_July_31_2018.pdf).

<sup>59</sup> Memorandum from Elaine C. Duke, Acting Secretary of Homeland Security, to the Acting Director of USCIS, the Acting Director of ICE, the Acting Commissioner of U.S. Customs and Border Protection, the Acting General Counsel, the Assistant Secretary of International Engagement, and the Citizenship and Immigration Services Ombudsman, *Rescission of the June 15, 2012 Memorandum Entitled “Exercising Prosecutorial Discretion with Respect to Individuals Who Came to the United States as Children,”* September 5, 2017, [www.dhs.gov/news/2017/09/05/memorandum-rescission-daca](http://www.dhs.gov/news/2017/09/05/memorandum-rescission-daca).



enjoined the administration's cancellation of the DACA program.<sup>60</sup> At the time this report was written, the ultimate outcome of these court cases was uncertain, with action on the injunctions pending in the U.S. Supreme Court, and USCIS was renewing benefits for current DACA recipients and allowing prior recipients to reapply but not accepting first-time applications.

Even though many DACA recipients are well educated, and some have filed applications on their own, many need legal assistance to do so. With the future of the program uncertain, some DACA recipients may also seek advice on alternate paths to maintain their work authorization and permission to stay in the country, and there is evidence to suggest that some could be eligible for other forms of immigration relief.<sup>61</sup> If the courts uphold the rescission of DACA, program recipients will start losing their benefits over a two-year period (in order of when they last renewed their benefits), during which time demand for legal services would likely rise.

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*With the future of the program uncertain, some DACA recipients may also seek advice on alternate paths to maintain their work authorization and permission to stay in the country.*

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## **B. TPS Holders**

In 1990, Congress created a form of humanitarian relief called Temporary Protected Status (TPS) for nationals of countries designated by the U.S. government as unsafe for return due to natural disasters, armed conflicts, or other extraordinary circumstances. In the legislation, Congress authorized the executive branch to decide which countries should be designated for TPS and whether to extend or terminate each designation when its expiration draws close (with extensions ranging from six to 18 months).<sup>62</sup>

As of January 2018, TPS covered more than 300,000 people nationwide from ten countries, with the largest groups being Salvadorans (195,000); Hondurans (57,000); and Haitians (46,000).<sup>63</sup> The current TPS designation for Hondurans was made in 1999 after a hurricane, and the designations for Salvadorans in 2001 and Haitians in 2011 after earthquakes. Since then, successive administrations have renewed these TPS designations. The Trump administration has announced the termination of TPS for 98 percent of current grantees (those from El Salvador, Haiti, Honduras, Nepal, Nicaragua, and Sudan, as well as a similar protection for several thousand Liberians).<sup>64</sup> For Haitians, TPS will expire on

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<sup>60</sup> For an overview of recent litigation, see National Immigration Law Center, "Status of Current DACA Litigation," updated August 6, 2018, [www.nilc.org/issues/daca/status-current-daca-litigation/](http://www.nilc.org/issues/daca/status-current-daca-litigation/).

<sup>61</sup> In a survey drawn from clients of 67 application service providers, 14 percent of potentially eligible DACA applicants qualified for another immigration benefit such as LPR adjustment, a U-visa as a victim of a crime, or Special Immigrant Juvenile status due to absence of a parent or guardian. See Tom K. Wong, Donald Kerwin, Jeanne M. Atkinson, and Mary Meg McCarthy, "Paths to Lawful Immigration Status: Results and Implications from the PERSON Survey," *Journal on Migration and Human Security* vol. 2, no. 4 (2014): 287–304. <http://jmhs.cmsny.org/index.php/jmhs/article/view/37>.

<sup>62</sup> Madeline Messick and Claire Bergeron, "Temporary Protected Status in the United States: A Grant of Humanitarian Relief that Is Less than Permanent," *Migration Information Source*, July 2, 2014, [www.migrationpolicy.org/article/temporary-protected-status-united-states-grant-humanitarian-relief-less-permanent](http://www.migrationpolicy.org/article/temporary-protected-status-united-states-grant-humanitarian-relief-less-permanent).

<sup>63</sup> Jill Wilson, *Temporary Protected Status: Overview and Current Issues* (Washington, DC: Congressional Research Service, 2018), <https://fas.org/sgp/crs/homesec/RS20844.pdf>.

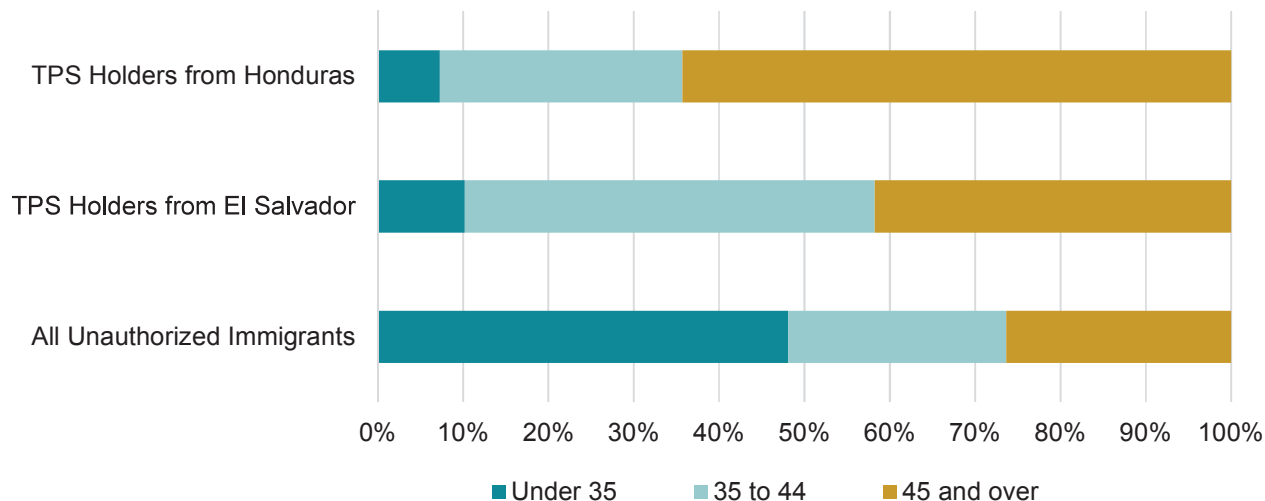
<sup>64</sup> Sarah Pierce, Jessica Bolter, and Andrew Selee, *U.S. Immigration Policy under Trump: Deep Changes and Lasting Impacts* (Washington, DC: MPI, 2018), 7, [www.migrationpolicy.org/research/us-immigration-policy-trump-deep-changes-impacts](http://www.migrationpolicy.org/research/us-immigration-policy-trump-deep-changes-impacts).

July 22, 2019, for Salvadorans on September 9, 2019, and for Hondurans on January 5, 2020.<sup>65</sup> Unlike with DACA, there have been no successful court challenges of the administration's TPS terminations.

In the Houston area, Salvadorans and Hondurans are the two largest groups of TPS holders. An estimated 16,000 TPS holders from El Salvador and 5,000 from Honduras resided there as of early 2017.<sup>66</sup> Other TPS-holder populations in the area also face the termination of their benefits, but these national groups were too small to estimate with precision.

The demographic characteristics of TPS holders in Houston vary somewhat by national group. Slightly more than half of TPS holders from El Salvador were men (52 percent), while among Hondurans, women comprised a majority (55 percent). Due to their long-term residence in the United States, TPS holders were substantially older than unauthorized immigrants. Ninety-percent of Salvadoran TPS holders and 93 percent of those from Honduras were age 35 or over, compared to 52 percent of unauthorized immigrants (see Figure 9).

**Figure 9. Age Distributions of Salvadoran and Honduran TPS Holders and All Unauthorized Immigrants in the Houston Metropolitan Area, 2012–16**



*Note:* These data are for the 12-county Houston metropolitan area, based on ACS boundaries.

*Source:* MPI analysis of pooled 2012–16 ACS data, with legal status assignments by Bachmeier and Van Hook, and January 2017 employment authorization document data MPI received February 20, 2018 from U.S. Citizenship and Immigration Services via a *Freedom of Information Act* (FOIA) request, tracking number COW2017000248.

Many TPS holders have regularly sought assistance in renewing their status in the years since their country was first designated. When their TPS expires, they will face a difficult choice: leave the United States, where they have lived for years or even decades, or remain and become unauthorized, losing their protection from deportation and authorization to work. While DACA recipients will lose their protection on a rolling basis depending on when they last had their benefits renewed—if the program's rescission

<sup>65</sup> USCIS, "Temporary Protected Status Designated Country: Haiti," updated July 23, 2018, [www.uscis.gov/humanitarian/temporary-protected-status/temporary-protected-status-designated-country-haiti](http://www.uscis.gov/humanitarian/temporary-protected-status/temporary-protected-status-designated-country-haiti); USCIS, "Temporary Protected Status Designated Country: El Salvador," updated May 9, 2018, [www.uscis.gov/humanitarian/temporary-protected-status/temporary-protected-status-designated-country-el-salvador](http://www.uscis.gov/humanitarian/temporary-protected-status/temporary-protected-status-designated-country-el-salvador); USCIS, "Temporary Protected Status Designated Country: Honduras," updated June 6, 2018, [www.uscis.gov/humanitarian/temporary-protected-status/temporary-protected-status-designated-country-honduras](http://www.uscis.gov/humanitarian/temporary-protected-status/temporary-protected-status-designated-country-honduras).

<sup>66</sup> These estimates are based on the number of employment authorization documents (EADs) issued to Salvadoran and Honduran TPS holders living in Texas in January 2017, multiplied by the ratio of Salvadorans and Hondurans eligible for TPS in the Houston area versus Texas. The EAD data were obtained from USCIS through a *Freedom of Information Act* (FOIA) request (COW2017000248) on February 20, 2018. The ratio of TPS eligible populations between Houston and Texas was calculated using the pooled 2012–16 ACS data and 2008 SIPP data, with imputations of legal status by James Bachmeier and Jennifer Van Hook.





is allowed to move forward—all TPS holders from a given country will lose their status and become unauthorized on the same date (e.g., all Salvadorans in September 2019 and all Hondurans in January 2020).

Those who remain in the United States after their benefits expire and become unauthorized may find it more difficult to sustain themselves economically if they lose their jobs as their work authorization expires. Because many are older, jobs that require physical labor and/or retraining may also be difficult to secure. Those nearing or past retirement age may also lose access to some retirement benefits.

### C. Asylum Seekers

Houston also has a substantial population of immigrants who are in the process of seeking asylum. Due in part to its proximity to the U.S.-Mexico border, many of the asylum seekers in the area are recently arrived Central Americans. To file an application, asylum seekers must be present in the United States; some cross the U.S. border illegally, while others enter on valid visas.<sup>67</sup> If they do not request asylum upon arrival at an airport or other port of entry, they must do so within one year of arriving in the country. Immigrants who are not in removal proceedings may request asylum affirmatively by applying to USCIS, while those who have been apprehended and placed in removal proceedings may request asylum defensively in immigration court.

The size of the asylum-seeker population in any given locality is difficult to estimate with precision since it cannot be easily differentiated from the unauthorized population. Based on U.S. government administrative data, it is likely that approximately 26,900 asylum seekers live in the Houston area; this estimate includes 17,300 asylum cases that were pending at the Houston USCIS asylum office at the end of June 2018,<sup>68</sup> and 9,600 asylum cases pending in Houston immigration courts in September 2016 (the most recent available data).<sup>69</sup> However, these estimates should be treated with due caution as some applications and cases may be for immigrants living elsewhere who filed in the Houston USCIS office or will appear in the Houston courts. Houston's asylum office handled 5 percent of the 320,000 asylum cases pending nationwide at the end of June 2018, while its immigration courts had 7 percent of the estimated 130,000 total defensive asylum cases pending nationally at the end of FY 2016.<sup>70</sup> The presence of an asylum office, immigration courts, and large immigrant communities in the Houston area has made it a hub for asylum seekers, many of whom require legal assistance with their cases.

## VI. Legal Immigrants Eligible to Naturalize

Legal permanent residents are eligible to naturalize if they have had their green cards for at least five years or, if married to a U.S. citizen, for at least three years. According to the University of Southern California, an estimated 298,000 immigrants in the 12-county Houston area were eligible to naturalize as of 2014.<sup>71</sup> Of these, 238,000 lived in Harris County; 29,000 in Fort Bend County; 12,000 in Montgomery County; 9,000 in Brazoria County; 6,000 in Galveston County; about 1,000 each in Waller, Liberty, and

<sup>67</sup> Most asylum seekers are unauthorized immigrants at the time they file an asylum application, but some request asylum while still on valid visas.

<sup>68</sup> USCIS, "Asylum Office Workload" (dataset, June 2018), [www.uscis.gov/sites/default/files/USCIS/Outreach/Upcoming%20National%20Engagements/AffirmativeAsylumStats\\_June2018.pdf](http://www.uscis.gov/sites/default/files/USCIS/Outreach/Upcoming%20National%20Engagements/AffirmativeAsylumStats_June2018.pdf).

<sup>69</sup> The estimate of 9,600 pending defensive asylum cases in the Houston immigration court is calculated by multiplying the share of total case completions in the in FY 2016 that were asylum cases (22 percent) by the total backlog in that court (43,734 in September 2016). See U.S. Department of Justice, Executive Office for Immigration Review, *FY 2016 Statistics Yearbook* (Washington, DC: U.S. Department of Justice, 2017), [www.justice.gov/eoir/page/file/fysb16/download](http://www.justice.gov/eoir/page/file/fysb16/download).

<sup>70</sup> Ibid.; USCIS, "Asylum Office Workload."

<sup>71</sup> The estimates in this paragraph come from University of Southern California, Center for the Study of Immigrant Integration, "Interactive Map: Eligible-to-Naturalize Populations in the U.S.," accessed August 15, 2018, <https://dornsife.usc.edu/csii/eligible-to-naturalize-map/>.



Wharton Counties; and fewer than 1,000 each in Chambers, Matagorda, Austin, and Colorado Counties. To complete the naturalization process, immigrants must pay the required fees and pass an oral test in English—requirements that can represent barriers to citizenship and the benefits that come with it for lower-income and LEP immigrants who are otherwise eligible to apply.

Of the immigrants estimated to be eligible to naturalize in the Houston area, most had their origins in either Mexico (51 percent) or Central America (19 percent). Another 14 percent were from countries in Asia, with smaller numbers from other world regions.<sup>72</sup>

## VII. Immigration Enforcement in the Houston Area

The Trump administration has set in motion a sweeping set of changes to immigration enforcement. The implementation of the January 2017 executive order entitled “Enhancing Public Safety in the Interior of the United States” led to a 30-percent increase in ICE arrests in the interior of the country between FY 2016 and FY 2017. However, the Houston ICE region (54 counties in southeast Texas) experienced a more modest 5-percent increase from an already-high level of annual arrests.<sup>73</sup> During FY 2015 and FY 2016, Houston had more arrests than any other ICE region, though in FY 2017 Dallas surpassed it.

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*ICE at-large arrests rose 55 percent nationwide during the first four months of the Trump administration, and in the Houston ICE region, by a roughly comparable 57 percent.*

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ICE primarily conducts two types of arrests.<sup>74</sup> The first type—“at-large” or “fugitive” arrests—occurs when ICE officers pursue predetermined targets in the community, often arresting them in their homes, at workplaces, or when they are driving. Sometimes, ICE also arrests bystanders who are unauthorized or otherwise deportable but who were not the original target of arrests. ICE at-large arrests rose 55 percent nationwide during the first four months of the Trump administration, and in the Houston ICE region,<sup>75</sup> by a roughly comparable 57 percent. However, at-large arrests comprised only 29 percent of all ICE arrests nationwide, and just 12 percent in Houston (654 arrests) during that period.<sup>76</sup> In a more recent and well-publicized at-large operation in the Houston area, carried out in early August 2018, ICE made 45 arrests: 26 in the city of Houston and the remainder in suburbs such as Baytown, Clear Lake, Conroe, and the Woodlands.<sup>77</sup>

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<sup>72</sup> Ibid.

<sup>73</sup> The Obama administration was still in office during the first four months of FY 2017 (October 2016 through January 2017). If only the eight months of the Trump administration (February through September 2017) are included, the increase in ICE arrests over the previous year was 42 percent. ICE regional arrest statistics are available only for all of FY 2017, making it difficult to distinguish between those made under the Obama and Trump administrations. It is possible that the Houston region’s total arrests increased more than 5 percent during this period. See Capps et al., *Revving Up the Deportation Machinery*.

<sup>74</sup> In 2018, ICE began conducting more arrests at worksites. But the number of immigrants taken into custody in these arrests is thus far in the hundreds, representing a small fraction of all ICE arrests during the Trump administration.

<sup>75</sup> These at-large arrest figures are for the 54-county region covered by the Houston ICE office and could not be disaggregated for the 12 counties of the Houston metropolitan area.

<sup>76</sup> MPI analysis of ICE Enforcement and Removal Operations (ERO) administrative arrest data received June 28, 2017, via FOIA request from ERO LESA Statistical Tracking Unit, FOIA Tasking 2017-ICFO-27751.

<sup>77</sup> Houston Public Media, “ICE Arrests 45 Unauthorized Immigrants in Houston Area during Five-Day Operation,” Houston Public Media, August 13, 2018, [www.houstonpublicmedia.org/articles/news/2018/08/13/299916/ice-arrests-45-unauthorized-immigrants-in-houston-area-during-five-day-operation/](http://www.houstonpublicmedia.org/articles/news/2018/08/13/299916/ice-arrests-45-unauthorized-immigrants-in-houston-area-during-five-day-operation/).



The second type of ICE arrest is jail based and made in cooperation with local law enforcement agencies. These represent the vast majority of ICE arrests—86 percent in the Houston ICE region during the first four months of the Trump administration—and occur after an immigrant is already booked into a state prison or local jail on non-immigration charges.<sup>78</sup> An immigrant can be identified as deportable in two ways: either through an interview with an ICE officer or a county sheriff's deputy in the jail, or through the Secure Communities program, which links fingerprints taken in jails with U.S. Department of Homeland Security records of prior immigration arrests, deportations, and other encounters. After an immigrant is identified as deportable, ICE issues a detainer—a request to hold the individual up to 48 hours on an immigration charge. The extra 48 hours gives ICE time to arrange to pick up the immigrant.<sup>79</sup> ICE depends on local law enforcement cooperating with detainers to bring large numbers of deportable immigrants into custody.

There is, however, considerable and growing divergence around the country between jurisdictions that do and do not honor ICE detainers. Those that do not cooperate have refused to hold immigrants the extra 48 hours, and in some cases release them without notifying ICE. These places are sometimes referred to as “sanctuaries,” though the term is legally vague and has been applied to a range of noncooperation policies, from symbolic statements opposing ICE cooperation to blanket prohibitions on it. Several states have passed legislation either requiring cooperation with ICE or prohibiting sanctuary policies.<sup>80</sup>

Travis County (which includes Austin) had a policy restricting cooperation with ICE but later rescinded it in August 2017 after Texas passed Senate Bill 4 (SB4),<sup>81</sup> which prohibits jurisdictions from placing any limits on ICE cooperation. No other counties or cities in Texas have had policies limiting cooperation with ICE in identifying immigrants in local custody or placing detainers on them.<sup>82</sup>

### **Detainer Issuance and Resulting Bookings into ICE Custody**

All counties in the Houston area fully cooperate with ICE, and some have 287(g) agreements through which ICE trains and delegates some authority to local officers to assist in immigration enforcement. Under a prior 287(g) agreement, Harris County deputies screened individuals in jails for legal status and removability (by asking questions about their immigration history, status, and other topics); placed immigration detainers on them; and began the removal process—all under the supervision of ICE officers. The county terminated its agreement in January 2017, and ICE officers replaced local 287(g) officers in the jails, performing the same functions.<sup>83</sup> Later that year, six suburban counties in the Houston area—Chambers, Galveston, Matagorda, Montgomery, Waller, and Wharton—signed their own 287(g) agreements.<sup>84</sup>

In February 2017, soon after Trump signed the executive order on interior enforcement, ICE began issuing more detainers on individuals in state and local custody.<sup>85</sup> The Houston area was no exception. In the 12-county metro area, the average number of detainers issued each month rose from 246 in FY 2016 to 450 in FY 2017 (the first few months of which were still part of the Obama administration) and then to 545 in the first seven months of FY 2018. Average monthly detainer issuance more than

<sup>78</sup> Two percent of arrests could not be coded as at-large or jail-based in the ICE administrative data.

<sup>79</sup> Capps et al., *Revvig Up the Deportation Machinery*.

<sup>80</sup> For example, California, Illinois, and Connecticut have laws requiring all jurisdictions to limit ICE cooperation, and several major cities, such as New York, Chicago, Philadelphia, Boston, Seattle, Baltimore, and Washington, DC, have sanctuary policies. See *Ibid*.

<sup>81</sup> State of Texas, *An Act Relating to the Enforcement by Campus Police Departments and Certain Local Governmental Entities of State and Federal Laws Governing Immigration and to Related Duties and Liability of Certain Persons in the Criminal Justice System; Providing a Civil Penalty; Creating a Criminal Offense*, SB4, *General and Special Laws of Texas*, Chapter 4 (2017), <https://lrl.texas.gov/scanned/signedBills/85-0/sb4.pdf>.

<sup>82</sup> Capps et al., *Revvig Up the Deportation Machinery*.

<sup>83</sup> *Ibid*.

<sup>84</sup> ICE, “Delegation of Immigration Authority Section 287(g) Immigration and Nationality Act” updated June 12, 2018, [www.ice.gov/287g](http://www.ice.gov/287g).

<sup>85</sup> Capps et al., *Revvig Up the Deportation Machinery*.

doubled in the area, rising faster in its suburban counties than in Harris County (see Table 8). But despite this growth, the monthly number of ICE-issued detainers in most of these counties was small—in the single digits in some—most likely because most of these counties have small unauthorized immigrant populations (see Table 3). Detainer issuance did not increase noticeably faster in counties with 287(g) agreements (shaded grey in the table) than those without agreements.

**Table 8. Average Monthly Detainer Issuance in the Houston Metropolitan Area, FYs 2016–18\***

	FY 2016	FY 2017	FY 2018*	Change 2016 to 2018	Percent Change 2016 to 2018 (%)
<b>Total 12-county metro area</b>	<b>246</b>	<b>450</b>	<b>545</b>	<b>299</b>	<b>122</b>
Harris County	195	332	381	186	95
Montgomery County	28	51	72	44	157
Fort Bend County	11	26	35	24	218
Galveston County	4	16	24	20	500
Brazoria County	2	6	10	8	400
Waller County	2	6	6	4	200
Liberty County	2	3	4	2	100
Colorado County	0	2	4	4	N/A
Chambers County	0	2	3	3	N/A
Wharton County	1	2	3	2	200
Matagorda County	0	2	2	2	N/A
Austin County	1	2	1	0	0

\* The FY 2018 averages are based on data for the first seven months of that year (October 2017 through April 2018).

*Notes:* The figures in this table are based on monthly averages of detainers issued during each fiscal year. Fiscal years run from October to September. Only detainers issued at central county jails are included in the table; small numbers of detainers were issued at local police precincts or smaller jails and are not included. Multiple detainers may be issued for the same individual. Counties with 287(g) agreements are shaded grey.

*Source:* Transactional Research Clearinghouse (TRAC), “Latest Data: Immigration and Customs Enforcement Detainers—ICE Data through April 2018,” accessed August 1, 2018, <http://trac.syr.edu/phptools/immigration/detain/>.

These increases in the number of detainers ICE issued are mostly due to the fact that the interior enforcement executive order expanded enforcement priorities from immigrants with felony and substantial misdemeanor convictions to those with any conviction or charge that results in arrest and booking in a county jail. In other words, more detainers were issued on people with minor criminal charges, and they did not have to be convicted before detainers could be issued. It is also possible that some local police became more aggressive in arresting unauthorized immigrants, knowing that once taken to the county jail, they would be identified as deportable and taken into ICE custody.

Not all detainers, however, result in immigrants being taken into ICE custody and deported. In some cases, multiple detainers are issued for the same individual (for instance, at a local police station and later at a county jail or state prison). In others, individuals must first serve out a prison term before ICE can take them into custody, or ICE may not have the resources to transport people from the jail or the space to house them in an ICE detention facility.

Data on how many detainers result in immigrants being taken into ICE custody are much more limited; MPI was able to obtain such data only through April 2017.<sup>86</sup> During the first seven months of FY 2017, half of the detainers issued in the 12-county Houston area resulted in an immigrant being booked into ICE custody (see Table 9). There was some variation across counties in the area, but this was partially a result of the very small numbers of detainers issued in some. For example, Chambers County had the

<sup>86</sup> ICE has not responded to multiple FOIA requests by MPI, TRAC, and other entities for data on detainers resulting in immigrants being booked into ICE custody since April 2017.



highest share of detainers resulting in book-ins, but the total number of book-ins was only 11 over the seven-month period.

Jail-based arrests remain heavily concentrated in Harris County. There has been some expansion of detainer issuance in the suburban counties, but the numbers of detainers issued—and those resulting in book-ins to ICE custody—are very low outside of the big four counties: Harris, Montgomery, Fort Bend, and Galveston.<sup>87</sup> As with the issuance of detainers, this is likely to remain the case due to the small unauthorized populations in most of these counties.

**Table 9. ICE Detainers Issued and Detainers Resulting in Book-Ins to ICE Custody in the Houston Metropolitan Area, October 2016 through April 2017**

	Total Detainers Issued	Detainers Resulting in ICE Book-Ins	Share Resulting in ICE Book-ins (%)
<b>Total 12-county metro area</b>	<b>2,886</b>	<b>1,451</b>	<b>50</b>
Harris County	2,219	1,133	51
Montgomery County	295	165	56
Fort Bend County	140	45	32
Galveston County	90	40	44
Brazoria County	31	11	35
Waller County	39	19	49
Liberty County	11	5	45
Colorado County	11	7	64
Chambers County	14	11	79
Wharton County	9	3	33
Matagorda County	10	3	30
Austin County	17	9	53

*Notes:* Only detainers issued at central county jails are included in the table; small numbers of detainers were issued at local police precincts or smaller jails and are not included. Detainers may not result in book-ins for a number of reasons, including: multiple detainers were issued on the same individual, individuals may be serving criminal sentences, or ICE may be unable to transport the individual or detain them.

*Source:* MPI analysis of ICE Enforcement and Removal Operations (ERO) detainers data received on August 3, 2017 via a FOIA request from ERO LESA Statistical Tracking Unit, FOIA Tasking 2017-ICFO-26209.

## VIII. Conclusions and Implications for Service Providers

Immigration has—and continues to—contribute to the diversity of the Houston metropolitan area population. The area is now home to more Latino than non-Hispanic White residents, alongside substantial Asian and African American populations. The African immigrant population is growing most rapidly, and there is substantial growth among Asian and Central American immigrants as well. Houston's proximity to the U.S.-Mexico border also attracts large numbers of Central American and South American migrants, some of whom are asylum seekers.

Houston is one of the fastest growing major metro areas, with population growth fueled by a mix of immigration, migration from other parts of the United States, and local births. Houston's economy is

<sup>87</sup> The data here precede the implementation of 287(g) agreements in some of the suburban counties, and therefore do not measure any expansion of ICE arrests that may have occurred in those counties since. During the first three months of this period, Harris County still had its 287(g) agreement in operation during the first three months shown here (October through December 2016). See ICE, "Delegation of Immigration Authority Section 287(g) Immigration and Nationality Act."





strong, and immigrants in the area have high labor-force participation rates. Nearly one-third of all workers in the area are immigrants. They can be found in large numbers in high-skilled sectors; in manufacturing, oil, and gas; and in the construction industry that has seen a boom in demand in the aftermath of Hurricane Harvey. However, immigrants earn lower wages on average than native-born workers, resulting in higher poverty rates (20 percent versus 14 percent, respectively).

The immigration policy climate this diverse and dynamic population finds itself in has changed substantially in recent years. Several years ago, there was great demand for legal services among unauthorized immigrants applying for DACA and planning to apply for Deferred Action for Parents of Americans (DAPA)—a larger temporary protection and work authorization program that was enjoined by the federal courts in 2015 and never went into effect. Demand for assistance with naturalization applications and DACA renewals has remained strong, but the center of gravity for immigration services has shifted. The rise in ICE arrests in Houston has increased interest in services related to deportation defense in detention facilities across Texas, where most arrested immigrants are kept until they are deported. At the same time, the substantial number of Central American families arriving at the U.S.-Mexico border has generated demand for assistance with asylum applications and, in some cases, reuniting families separated in Spring 2018 under the Trump administration's zero-tolerance policy. Houston area legal service providers should also be prepared to assist large shares of the area's estimated 36,000 DACA recipients and 21,000 TPS holders, if and when they lose their current protections.

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*Demand for assistance with naturalization applications and DACA renewals has remained strong, but the center of gravity for immigration services has shifted.*

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Additionally, some immigrants in Houston whose future legal status is uncertain may come forward to be screened for pathways to legal residence and work authorization. The nearly 100,000 unauthorized immigrants married to U.S. citizens or green-card holders are the most likely to be able to adjust their status, though a public-charge rule being developed by the administration may prevent some from doing so if they or a dependent family member has used public benefits.<sup>88</sup> Other groups that may seek assistance include students and temporary workers (legal nonimmigrants) who overstay their visas and thereby become unauthorized. In general, the tightening of rules and procedures around immigration admissions, adjustments of status, and asylum applications could expand and complicate the work of Houston area legal service providers.

Finally, many immigrants in need of legal assistance will not be able to afford it on the open market. The estimated poverty rate among unauthorized immigrants in Houston is 28 percent, and among LPRs, only slightly lower at 23 percent. Half of both populations have incomes below twice the federal poverty level. Thus, pro bono and subsidized legal services will remain in high demand not just among asylum seekers and ICE detainees, but among members of the general immigrant population seeking to adjust their status, become U.S. citizens, or otherwise navigate the shifting immigration landscape.

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<sup>88</sup> USCIS recently announced that it will grant its adjudicators more discretion to deny citizenship and green-card applications when insufficient evidence is presented, instead of requesting more evidence and continuing to adjudicate the applications. This could result in higher denial rates and make the application process more complex. See Memorandum from USCIS, *Issuance of Certain RFEs and NOIDs; Revisions to Adjudicator's Field Manual (AFM) Chapter 10.5(a), Chapter 10.5(b)*, July 13, 2018, [www.uscis.gov/sites/default/files/USCIS/Laws/Memoranda/AFM\\_10\\_Standards\\_for\\_RFEs\\_and\\_NOIDs\\_FINAL2.pdf](https://www.uscis.gov/sites/default/files/USCIS/Laws/Memoranda/AFM_10_Standards_for_RFEs_and_NOIDs_FINAL2.pdf).



## Appendices

### Appendix A. Origin Countries for the Houston Metropolitan Area Foreign-Born Population,\* 2017

Origin Countries		Number of Immigrants
<b>Total all countries</b>		<b>1,629,000</b>
1	Mexico	612,000
2	El Salvador	129,000
3	India	93,000
4	Vietnam	91,000
5	Honduras	70,000
6	China**	48,000
7	Guatemala	47,000
8	Nigeria	41,000
9	Philippines	38,000
10	Cuba	36,000
11	Pakistan	34,000
12	Venezuela	33,000
13	Colombia	26,000
14	United Kingdom***	24,000
15	Canada	18,000
16	Korea	14,000
17	Taiwan	12,000
18	Iran	11,000
19	Peru	11,000
20	Germany	8,000
21	Nicaragua	7,000
22	Brazil	7,000
23	Russia	7,000
24	Dominican Republic	7,000
<b>Origin Countries with Approximately 6,000 Immigrants</b>		
Iraq, Jamaica, Japan, Kenya, Lebanon, South Africa, Trinidad and Tobago		
<b>Origin Countries with Approximately 5,000 Immigrants</b>		
Bangladesh, Ethiopia, France		
<b>Origin Countries with Approximately 4,000 Immigrants</b>		
Argentina, Cambodia, Cameroon, Egypt, Panama, Saudi Arabia, Spain		
<b>Origin Countries with Approximately 3,000 Immigrants</b>		
Australia, Haiti, Hong Kong, Indonesia, Italy, Jordan, Morocco, Scotland, Syria, Turkey		
<b>Origin Countries with Approximately 2,000 Immigrants</b>		
Afghanistan, Belize, Bolivia, Burma (also known as Myanmar), Costa Rica, Dominica, Ecuador, Ghana, Liberia, Malaysia, Nepal, Netherlands, Norway, Poland, Romania, Somalia, Sri Lanka, Sudan, Thailand		
<b>Origin Countries with Approximately 1,000 Immigrants</b>		
Albania, Belgium, Bulgaria, Chile, Guyana, Kuwait, Ukraine, Uruguay		

\* Figures are shown for all origin groups with at least 1,000 immigrants. Estimates below 1,000 are excluded as they may not be reliable due to margins of error in the 2017 ACS.

\*\* China excludes Hong Kong and Taiwan.

\*\*\*United Kingdom includes Crown dependencies.

*Note:* These data are for the official Houston metropolitan area, as defined by the U.S. Census Bureau, and not the 12-county area defined by the boundaries in the ACS microdata used for other tables in this report.

*Source:* U.S. Census Bureau, "American FactFinder—B05006."



**Appendix B. All Major Industries of Employment of Adults (age 16 and over) in the Houston Metropolitan Area, by Immigration Status, 2012–16**

	All Workers	U.S.-Born workers	All Foreign-Born Workers	Naturalized Citizens	Legal Permanent Residents	Legal Noncitizens	Unauthorized Immigrants
<b>All industries</b>	<b>3,221,000</b>	<b>2,194,000</b>	<b>1,027,000</b>	<b>358,000</b>	<b>311,000</b>	<b>40,000</b>	<b>318,000</b>
Health Care and Social Assistance	356,000	262,000	94,000	56,000	20,000	2,000	16,000
Retail Trade	348,000	248,000	100,000	39,000	30,000	2,000	29,000
Manufacturing	329,000	218,000	111,000	40,000	33,000	6,000	32,000
Construction	304,000	143,000	161,000	24,000	65,000	<2,000	72,000
Educational Services	276,000	220,000	57,000	28,000	13,000	6,000	10,000
Professional, Scientific, and Technical Services	234,000	177,000	57,000	27,000	12,000	9,000	9,000
Accommodation and Food Services	229,000	126,000	104,000	19,000	39,000	<2,000	45,000
Other Services, Except Public Administration	183,000	100,000	83,000	25,000	26,000	<2,000	31,000
Administrative, Support, and Waste Management Services	163,000	89,000	74,000	15,000	27,000	<2,000	32,000
Transportation and Warehousing	156,000	115,000	41,000	20,000	11,000	<2,000	10,000
Finance and Insurance	116,000	96,000	20,000	11,000	4,000	<2,000	4,000
Wholesale Trade	115,000	83,000	33,000	12,000	9,000	2,000	9,000
Mining, Quarrying, and Oil and Gas Extraction	112,000	81,000	31,000	13,000	6,000	6,000	5,000
Public Administration	92,000	81,000	12,000	8,000	2,000	<2,000	2,000
Real Estate and Rental and Leasing	70,000	51,000	18,000	8,000	5,000	<2,000	5,000
Arts, Entertainment, and Recreation	44,000	35,000	9,000	3,000	3,000	<2,000	2,000
Information	44,000	35,000	9,000	4,000	2,000	<2,000	2,000
Utilities	32,000	25,000	7,000	3,000	2,000	<2,000	<2,000
Agriculture, Forestry, Fishing, and Hunting	12,000	7,000	6,000	<2,000	2,000	<2,000	2,000
Management of Companies and Enterprises	5,000	4,000	<2,000	<2,000	<2,000	<2,000	<2,000

Notes: More precise figures for populations of fewer than 2,000 people are not displayed due to high margins of error in estimating small populations. Active-duty members of the military are excluded. These data are for the 12-county Houston metropolitan area, based on ACS boundaries.

Source: MPI analysis of 2012-16 ACS data (pooled) and 2008 SIPP, with legal status assignments by Bachmeier and Van Hook.





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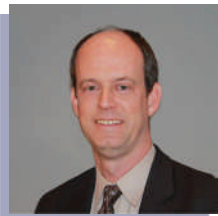
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## About the Authors

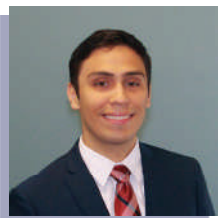


**Randy Capps** is Director of Research for U.S. Programs at the Migration Policy Institute (MPI). His areas of expertise include immigration trends, the unauthorized population, immigrants in the U.S. labor force, the children of immigrants and their wellbeing, and immigrant health-care and public-benefits access and use.

Dr. Capps, a demographer, has published widely on immigrant integration at the state and local level, including profiles of immigrant populations in Arkansas, Connecticut, and Maryland, as well as Los Angeles, CA, Washington, DC, Louisville, KY, and Napa County, CA. He has also examined the impact of the detention and deportation of immigrant parents on children.

Prior to joining MPI, Dr. Capps was a researcher in the Immigration Studies Program at the Urban Institute (1993–96 and 2000–08).

He received his PhD in sociology from the University of Texas in 1999 and his master of public affairs degree, also from the University of Texas, in 1992.



**Ariel G. Ruiz Soto** is an Associate Policy Analyst at MPI, where he provides quantitative research support across programs. He also manages MPI's internship program.

His research focuses on the impact of U.S. immigration policies on immigrants' experiences of socioeconomic integration across varying geographical and political contexts. More recently, Mr. Ruiz Soto has analyzed methodological approaches to estimate sociodemographic trends of the unauthorized immigrant population in the United States. His research has been published in *Latino Studies* and in *Crossing the United States-Mexico Border: Policies, Dynamics, and Consequences of Mexican Migration to the United States* (University of Texas Press).

Mr. Ruiz Soto holds a master's degree from the University of Chicago's School of Social Service Administration with an emphasis on immigration policy and service provision, and a bachelor's degree in sociology from Whitman College.





The Migration Policy Institute is a nonprofit, nonpartisan think tank dedicated to the study of the movement of people worldwide. MPI provides analysis, development, and evaluation of migration and refugee policies at the local, national, and international levels. It aims to meet the rising demand for pragmatic and thoughtful responses to the challenges and opportunities that large-scale migration, whether voluntary or forced, presents to communities and institutions in an increasingly integrated world.

[www.migrationpolicy.org](http://www.migrationpolicy.org)

1400 16<sup>th</sup> Street NW  
Suite 300  
Washington, DC 20036

Tel: 001 202-266-1940  
Fax: 001 202-266-1900



March 2018

# Hurricane Harvey: The Experiences of Immigrants Living in the Texas Gulf Coast

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Prepared by:

Bryan Wu, Liz Hamel, Mollyann Brodie  
Kaiser Family Foundation

and

Shao-Chee Sim and Elena Marks  
Episcopal Health Foundation



AR002129



## Introduction

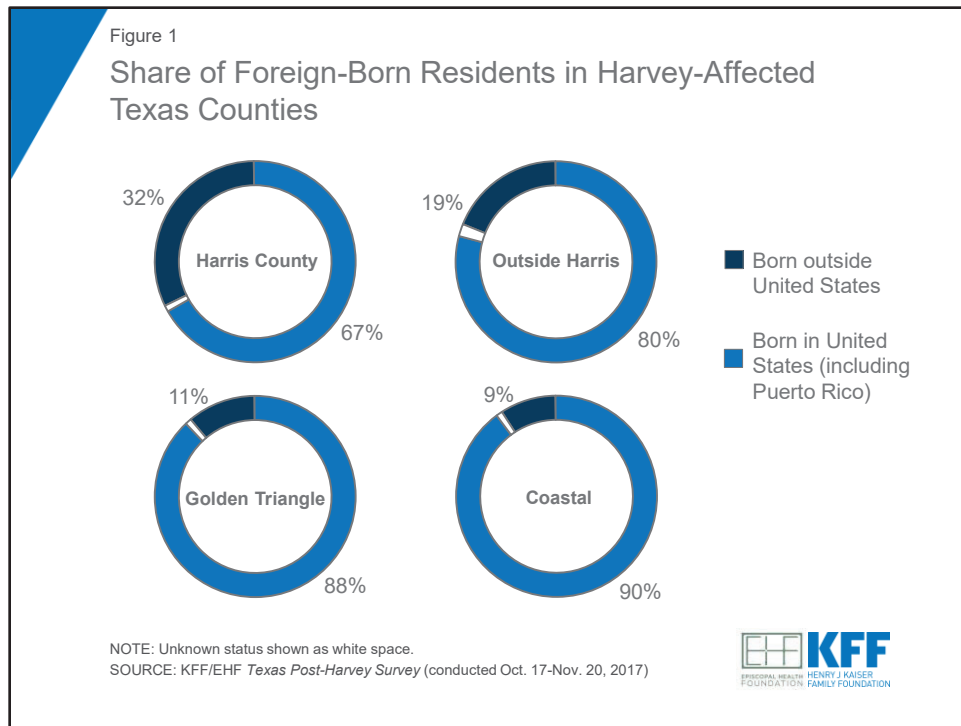
On August 25, 2017, Hurricane Harvey began devastating large parts of the Texas Gulf Coast region. In order to provide policymakers, funders, and others working on the recovery effort with reliable information about how Texas residents were affected by Hurricane Harvey and what their needs and priorities are when it comes to recovery, the Kaiser Family Foundation and the Episcopal Health Foundation partnered to conduct a representative survey of residents in 24 counties along the Texas Gulf Coast that were heavily impacted by property damage from the storm. Using data from the survey, this brief gives an overview of the views and experiences of immigrants who were living in Texas Gulf Coast counties that were affected by Hurricane Harvey<sup>1</sup>. For a variety of reasons, including potential language barriers, lack of social ties, and fears of drawing attention to their own or someone else's legal resident status, immigrants may be more vulnerable to the effects of natural disasters and their aftermath compared to those who were born in the United States. This summary aims to highlight immigrants' experiences with Harvey in order to better understand the particular needs of this potentially vulnerable population both in recovering from Harvey and preparing for future storms. A full report on the survey can be found [here](#).

## Key Findings

- Compared with native-born residents, immigrants in the Texas counties surveyed report more tenuous financial and social circumstances. Seven in ten say they have just a few or no people living nearby they can rely on for help or support, and more than half report incomes below 200% of the federal poverty level.
- Immigrants were more likely than other residents to report employment and income losses as a result of Hurricane Harvey (64 percent versus 39 percent). While immigrants were somewhat less likely than native residents to report damage to their homes as a result of the storm, among those who did have damage, immigrants were less likely to say they had applied for disaster assistance (40 percent versus 64 percent) or that they had any type of home or flood insurance (41 percent versus 55 percent).
- Half of immigrants whose homes were damaged (46 percent) said they were worried that if they tried to get help in recovering from Hurricane Harvey, they would draw attention to their or a family member's immigration status.
- Immigrants who were affected by Harvey were more likely than non-immigrants to say they needed additional help getting medical care following the storm, reflecting the fact that immigrants were less likely to report having health insurance or a regular source of care.
- Similar to residents overall, immigrants ranked rebuilding destroyed homes, along with financial and housing help for those who need it, as the top priorities for Harvey recovery efforts.

## A Profile of Immigrants in Harvey-Affected Texas Counties

Across the 24 Texas counties included in the survey, a quarter of adult residents said they were born outside the United States. The share identifying as immigrants was highest in Harris County (32 percent), followed by the counties surrounding Harris (19 percent). In the Golden Triangle and Coastal areas, roughly one in ten said they were born outside the United States.<sup>2</sup>

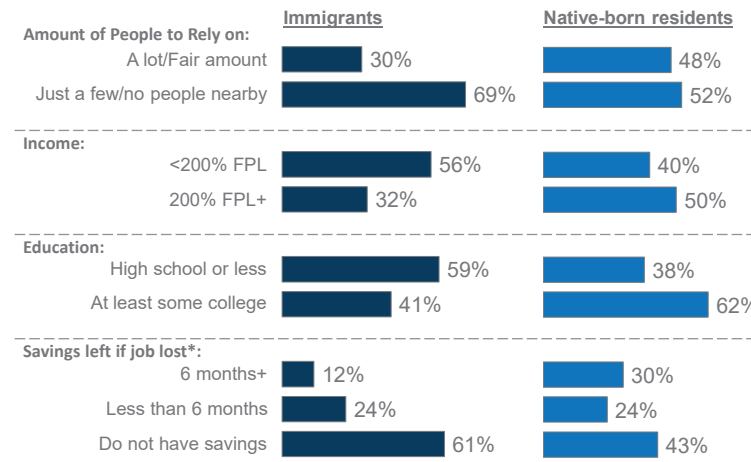


In the 24-county region, there are a number of characteristics that distinguish immigrants from their native-born counterparts. Some of these differences may point to the potential vulnerability of foreign-born residents in recovering from storms such as Harvey.

Compared to native-born residents, immigrants in these Texas counties report more tenuous financial and social circumstances. When asked how many relatives and friends they had living nearby who they could rely on for help and support, seven in ten immigrants (69 percent) said they had “just a few” or “no people living nearby.” This is compared to about half of native-born residents who said the same. In terms of their economic situation, immigrants were more likely than native-born residents to report having incomes under 200% of the Federal Poverty Level (56 percent versus 40 percent), and less likely to have at least some college education (62 percent versus 41 percent). Among those who were directly affected by Hurricane Harvey, immigrants were much less likely than those born in the United States to say that if they lost their job or source of income, they would be able to live comfortably for at least 6 months (12 percent versus 30 percent).

Figure 2

## Immigrants in Harvey-Affected Texas Counties Report Lower Incomes, Education than Native-Born Residents



\*Asked among those affected by Hurricane Harvey. Don't know/Refused responses not shown.  
SOURCE: KFF/EHF Texas Post-Harvey Survey (conducted Oct. 17-Nov. 20, 2017)

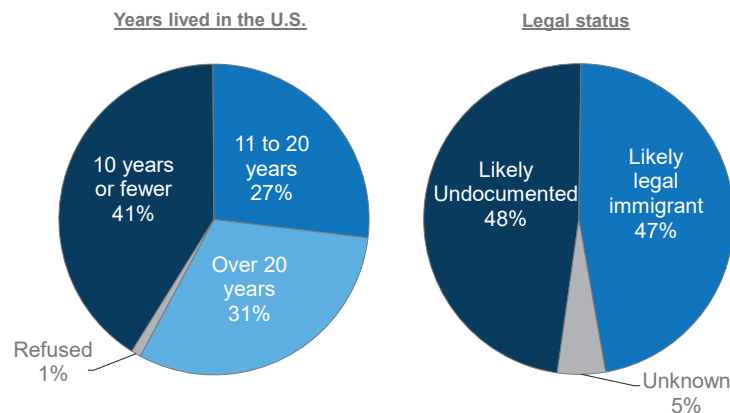


Four in ten foreign-born residents (41 percent) in the survey said they had lived in the United States for 10 years or fewer.<sup>3</sup> Furthermore, about half were likely to be undocumented – a status that was determined by asking immigrants whether they were a permanent resident (i.e. had a green card) when they came to the United States or if their status had been changed to permanent resident since arriving.

Figure 3

## Four in Ten Immigrants Lived in the U.S. for Ten Years or Fewer; Half Likely to Be Undocumented

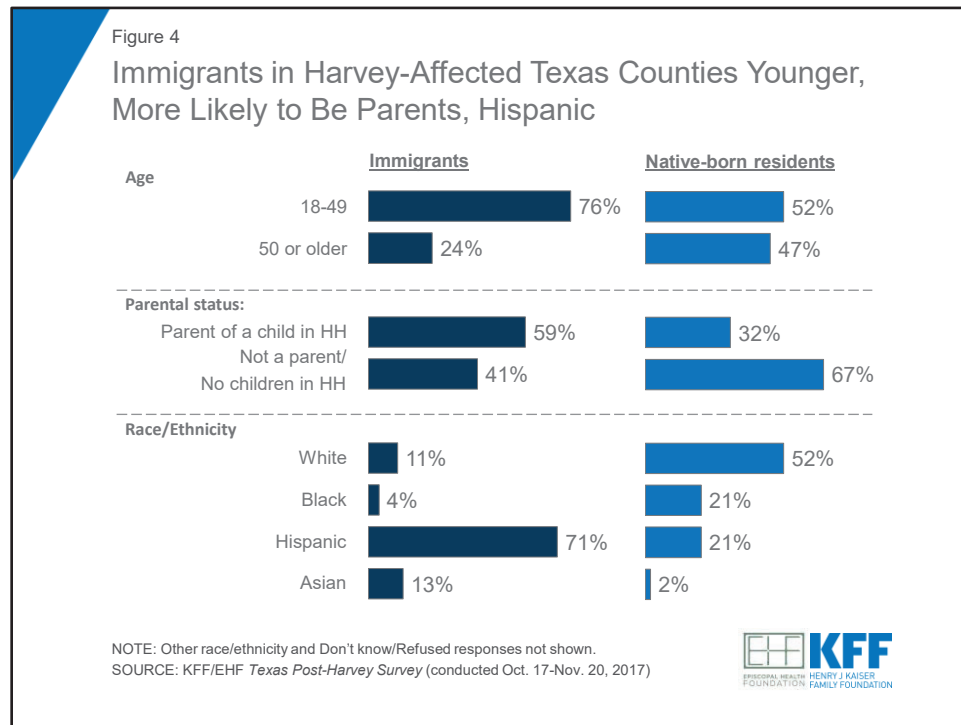
AMONG TEXAS GULF COAST IMMIGRANTS IN 24 HARVEY-AFFECTED COUNTIES:



SOURCE: KFF/EHF Texas Post-Harvey Survey (conducted Oct. 17-Nov. 20, 2017)



There are also other differences in the demographic profiles of immigrants and native-born residents in the Texas Gulf Coast – specifically by age, parental status, and race/ethnicity. Compared to residents born in the United States, immigrants were younger (three-quarters are under 50 years of age) and more likely to be the parent of a child in their household. About seven in ten immigrants in the 24-county region were Hispanic.

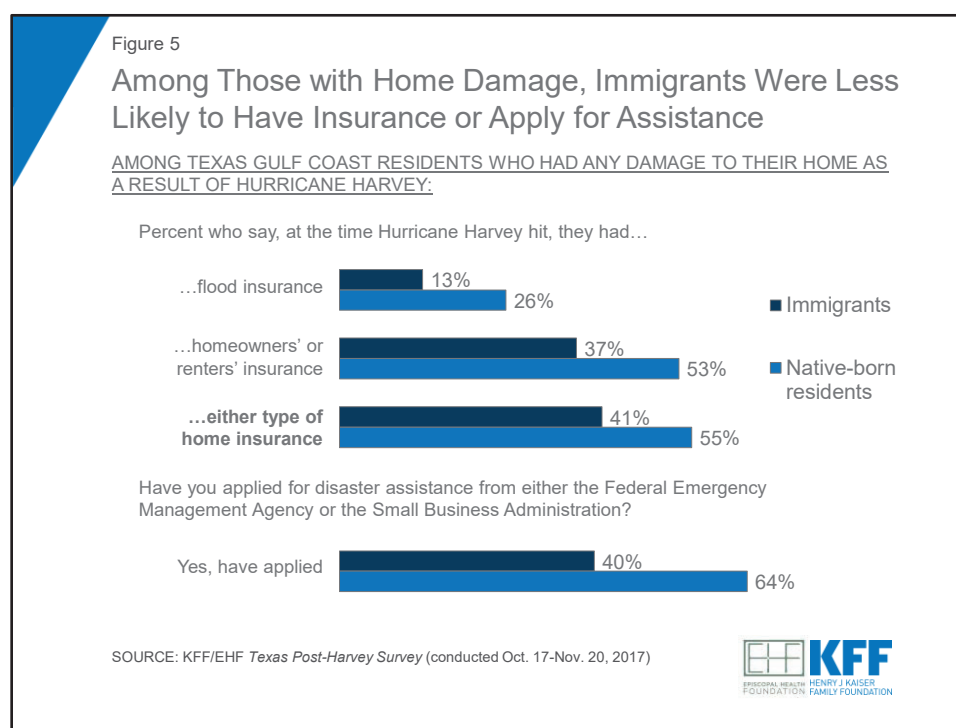


## How Were Immigrants Affected by Hurricane Harvey?

Reflecting their more challenging financial circumstances and lower levels of education, immigrants were particularly vulnerable to employment and income disruptions as a result of Hurricane Harvey. A larger share of immigrants said they experienced some type of income or job loss as a result of the storm compared to native-born residents (64 percent versus 39 percent). Specifically, immigrants were more than twice as likely to say someone in their household had overtime or regular hours cut back at work (54 percent versus 24 percent). By contrast, immigrants were somewhat less likely than individuals born in the United States to say their home was damaged as a result of the storm (35 percent versus 45 percent).<sup>4</sup> Overall three-quarters (74 percent) of immigrants in the region said they were affected by some type of property damage to their home or vehicle and/or some form of job or income loss, compared to 63 percent of native-born residents.

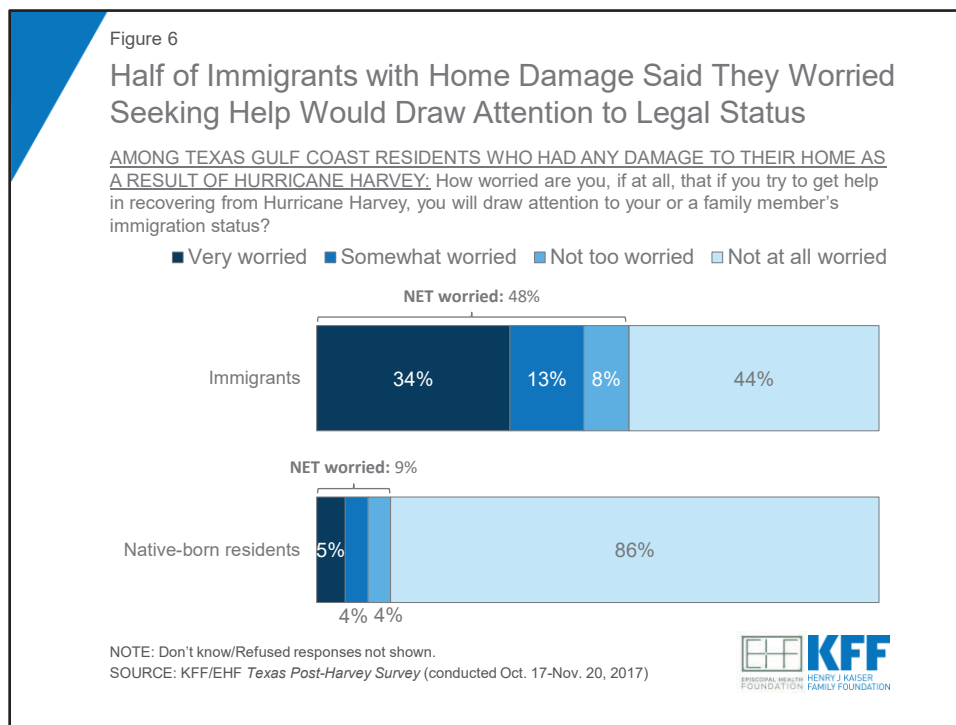
Table 1: Hurricane Harvey Effects by Residency Status		
Percent who report the following as a result of Hurricane Harvey:	Immigrants	Native-born
Someone in household experienced income/job loss (NET)	64%	39%
Someone in household was laid off/lost a job	16	10
Someone in household had hours cut back at work	54	24
Someone in household had any other loss of income	39	29
Home was damaged (NET)	35	45
Home had major damage or was destroyed	12	22
Home had minor damage	22	23
Vehicle was damaged	21	21
<b>Any property damage/income effects</b>	<b>74</b>	<b>63</b>

Again perhaps related to their economic status, immigrants who had damage to their home as a result of Hurricane Harvey were less likely than those born in the United States to say they had either flood insurance or homeowners'/renters' insurance at the time Hurricane Harvey hit (41 percent versus 55 percent). Immigrants who were affected by Harvey were also less likely to report applying for government assistance after the storm. Four in ten immigrants whose homes were damaged said they applied for disaster assistance from either FEMA or the SBA following the hurricane, while almost two-thirds of native-born residents said they applied.



One potential reason immigrants may have been less likely to apply for disaster assistance is a possible fear of highlighting their own or someone else's legal resident status. Half of immigrants with home damage said they were "somewhat" or "very worried" (48 percent) that if they tried to get help in

recovering from Hurricane Harvey they would draw attention to their or a family member's immigration status, while one in ten (9 percent) native-born residents said they were worried.



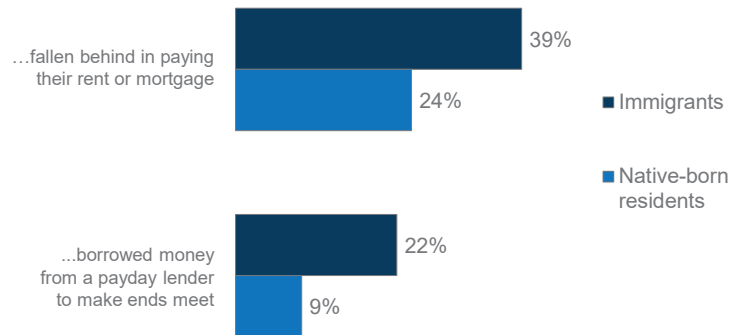
## Financial Issues and Access to Health Care Following the Storm

Further highlighting the income challenges that Texas Gulf Coast immigrants experienced as a result of Hurricane Harvey, the survey also finds foreign-born residents disproportionately likely to report financial difficulties in the months after the hurricane. Compared to residents born in the United States, immigrants affected by Harvey were significantly more likely to say that they or any other adult in their household had fallen behind in paying their rent or mortgage since the storm (39 percent versus 24 percent). Similarly, a larger share of immigrants said that they or a family member had borrowed money from a payday lender to make ends meet (22 percent versus 9 percent).

Figure 7

### Immigrants More Likely than Native-Born Residents to Report Financial Problems Following Harvey

AMONG TEXAS GULF COAST RESIDENTS AFFECTED BY HURRICANE HARVEY: Percent who say, since Hurricane Harvey, they or any other adult in their household have...



SOURCE: KFF/EHF Texas Post-Harvey Survey (conducted Oct. 17-Nov. 20, 2017)

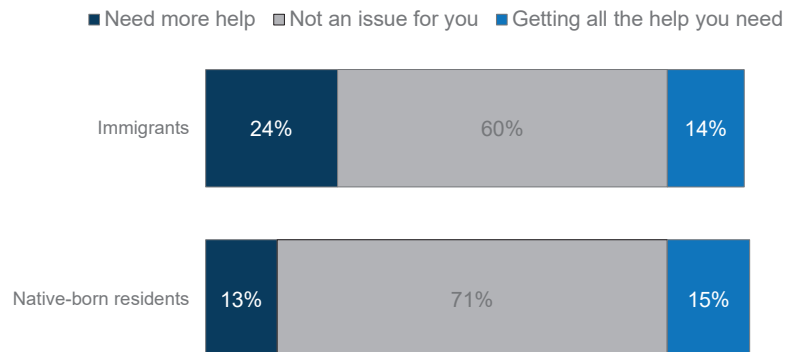


Immigrants were also more likely to report problems accessing health care in the wake of the storm. About a quarter (24 percent) of immigrants who were affected by the storm said they needed more help with getting the medical care they and their family needed, compared to a smaller share (13 percent) of native-born residents.

Figure 8

### Immigrants More Likely than U.S.-Born Residents to Say They Needed More Help Getting Medical Care

AMONG TEXAS GULF COAST RESIDENTS AFFECTED BY HURRICANE HARVEY: What about getting the medical care you and your family need? Do you need more help, are you getting all the help you need, or is this not an issue for you?

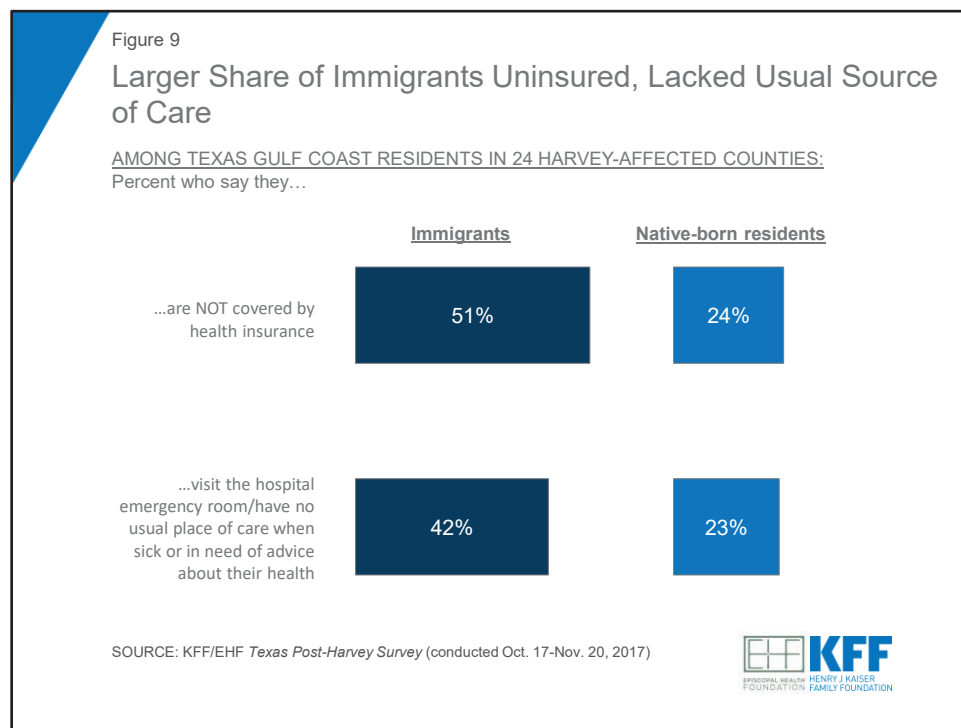


NOTE: Don't know/Refused responses not shown.

SOURCE: KFF/EHF Texas Post-Harvey Survey (conducted Oct. 17-Nov. 20, 2017)



This difference may be related to the fact that immigrants are more likely than native-born residents to lack insurance coverage and access to health care providers. When asked about their health care, immigrants were about twice as likely as native-born residents to say they did not have health insurance (51 percent versus 24 percent). About four in ten immigrants also said they either visit the hospital emergency room or they have no usual place of care to go to when sick or in need of advice about their health (42 percent). This is compared to a much smaller share of residents born in the United States who said the same (23 percent).



## Priorities for Rebuilding Harvey-Affected Communities

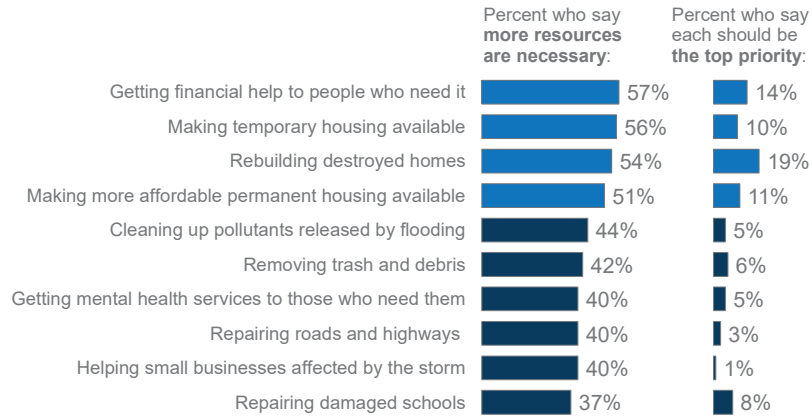
Immigrants in the 24-county region – including those who were affected by the hurricane and those who weren't – identified many areas where more resources were needed for rebuilding and recovery efforts in Harvey-affected communities. Similar to all adults living along the Texas Gulf Coast, priorities for foreign-born residents focused on providing financial and housing help to those in need. A majority of foreign-born residents said more resources were necessary in getting financial help to people who need it (57 percent), making temporary housing available (56 percent), rebuilding destroyed homes (54 percent), and making more affordable permanent housing available (51 percent). When forced to choose the top priority, rebuilding destroyed homes ranked first (19 percent), followed by getting financial help to people who need it (14 percent), making more affordable permanent housing available (11 percent), and making temporary housing available (10 percent).



Figure 10

## Immigrants' Top Priorities For Rebuilding Focus on Financial and Housing Help

AMONG TEXAS GULF COAST IMMIGRANTS IN 24 HARVEY-AFFECTED COUNTIES:



NOTE: Top priority includes those who said more resources necessary in only one area.  
SOURCE: KFF/EHF Texas Post-Harvey Survey (conducted Oct. 17-Nov. 20, 2017)



## Conclusion

Immigrants in the Texas Gulf Coast region faced some particular challenges compared to their native-born counterparts even before Hurricane Harvey hit, including more tenuous financial circumstances, poorer access to health care and insurance, and smaller nearby social support networks. The survey finds that the hurricane exacerbated some of these challenges, as immigrants were more likely than other Texans to experience job-related income loss as a result of the storm. As recovery efforts continue, these data indicate that help with financial recovery and access to health care may be of particular benefit to immigrants living in the Texas gulf coast region.

## Endnotes

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<sup>1</sup> In this brief, immigrants are defined as adults who were born outside of the United States (including the island of Puerto Rico) and were living in the 24-county area at the time Hurricane Harvey hit.

<sup>2</sup> The counties included in each county grouping are: Harris County; Surrounding Harris: Liberty, Chambers, Galveston, Brazoria, Matagorda, Wharton, Colorado, Austin, Waller, Fort Bend, Montgomery, and Walker counties; Golden Triangle: Orange, Jefferson and Hardin counties; and Coastal: Nueces, San Patricio, Refugio, Aransas, Calhoun, Victoria, Jackson, and Lavaca counties.

<sup>3</sup> Due to sample size, we are unable to report on findings for the subgroup of more recent immigrants who had lived in the United States fewer than 10 years.

<sup>4</sup> This difference in reported home damage is at least partially due to where immigrants reside within the 24-county area, with immigrants being less likely than native-born residents to live in the Golden Triangle or Coastal County areas where residents reported the highest rates of Harvey-related home damage.

**THE HENRY J. KAISER FAMILY FOUNDATION**

**Headquarters**

185 Berry Street Suite 2000  
San Francisco CA 94107  
650 854 9400

**Washington Offices and Conference Center**

1330 G Street NW  
Washington DC 20005  
202 347 5270

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address the underlying causes of poor health in Texas.

HOUSTON IMMIGRATION  
LEGAL SERVICES COLLABORATIVE

November 8, 2019

*Submitted via [www.regulations.gov](http://www.regulations.gov)*

Samantha Deshommes  
Chief, Regulatory Coordination Division, Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, DC 20529-2140

Re: DHS Docket No. USCIS-2018-0001 and/or RIN: 1615-AC19, Comments in Response to  
Proposed Rule: Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-  
765 Employment Authorization Applications

Dear Madam:

I am writing on behalf of the Houston Immigration Legal Services Collaborative (HILSC) in response to the Department of Homeland Security's (DHS) proposed rule to express our strong opposition to the changes regarding the processing provision for asylum applicant-related employment authorization documents. The proposed rule will cause major harm to asylum seekers and their families– yet DHS has not provided significant justification for why changes are needed. HILSC urges that the rule be withdrawn in its entirety.

HILSC is a consortium made up of over 40 immigration legal services providers, social services agencies, and advocacy organizations serving Houston's immigrant communities. Our mission is to advocate for immigrant inclusion, equity, and justice by uniting and strengthening diverse allies, developing holistic immigration legal services, and supporting creative initiatives through principled, values-based collaboration. Our member legal services organizations regularly advise and represent adult and child asylum seekers in their proceedings before the Asylum Office and the Executive Office for Immigration Review (EOIR). Our staff have years of experience working with immigrants, both in the legal context and in social services.

HILSC opposes the proposed rule because it would significantly harm asylum seekers and their families. Asylum seekers carry with them significant trauma and are particularly vulnerable to exploitation, trafficking, and underground economy risks. Delays in getting work authorization would exacerbate these risks and significantly reduce the safety and health of asylum seekers and their families because of an inability to support themselves without income from working. This lack of income could also make it more difficult for asylum seekers to secure counsel in their pending immigration proceedings. Furthermore, delays mean that asylum seekers cannot access a secure and valid ID.

The number of asylum seekers in Houston is hard to estimate, but based on the most recent public data from the U.S. government, we estimate there are approximately 36,227 asylum seekers living in the Houston area. There are 20,519 pending affirmative applications in

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Houston as of March 2019;<sup>1</sup> and an estimated 15,708 defensive asylum cases are still pending in Houston as of September 2018.<sup>2</sup>

### The Proposed Rule Will Harm Asylum Seeking Families

Due to the nature of flight from perilous situations, many asylum seekers do not possess valid identification. Without an EAD and subsequent social security number, asylum seekers in Houston are unable to obtain a Texas state ID or driver's license. This is important for asylum seekers of all ages – regardless of whether they plan to work. Furthermore, individuals will be unable to secure a valid ID and be increasingly vulnerable to exploitation, trafficking, and underground economic risks.

Not having a U.S government-issued identification can further limit an asylum seeker's access to transportation, banking, and private support services. Many social services programs – from community service agencies to shelters to health care centers – require some form of valid ID, proof of residency, or proof of income.

For asylum seekers who depend on the ability to work to support themselves and their families, the delays in obtaining an EAD would mean lost income and could drive families into debt that could take years to recover from. USCIS admits, in its cost and benefits analysis, that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community.

A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. This risks food insecurity, insufficient nutrition for children, risk of homelessness, and lack of access to medical care. Asylum seekers in Texas would be unable to access health insurance on the ACA health exchange, which requires a social security number and work authorization materials to qualify.<sup>3</sup>

Federal law does not provide any asylum seeker-specific support, such as income, housing or food assistance.<sup>4</sup> Asylum seekers are considered “non-qualified” immigrants for purposes of federal public assistance and therefore are generally ineligible for federal assistance, except in the context of emergency humanitarian circumstances or disaster relief.<sup>5</sup> Forcing asylum seekers to wait even longer for work authorization would further risk the health, safety, and very lives of those requesting protection in the United States.

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<sup>1</sup> This number reflects local office data and does not include circuit-ride applications USCIS, “Asylum Office Workload” (dataset, March 2019), [www.uscis.gov/sites/default/files/USCIS/Outreach/Notes%20from%20Previous%20Engagements/PED AffirmativeAsylumStatisticsMar2019.pdf](http://www.uscis.gov/sites/default/files/USCIS/Outreach/Notes%20from%20Previous%20Engagements/PED%20AffirmativeAsylumStatisticsMar2019.pdf)

<sup>2</sup> This is calculated by multiplying the share of total completions in FY2018 (205,044) that were asylum cases (64,491) by the total backlog in the Houston court as of September 2018 (52,361). See U.S. Department of Justice, Executive Office for Immigration Review, “Statistics Yearbook Fiscal Year 2018,” [www.justice.gov/eoir/file/1198896/download](http://www.justice.gov/eoir/file/1198896/download)

<sup>3</sup> [www.law.cornell.edu/cfr/text/45/152.2](http://www.law.cornell.edu/cfr/text/45/152.2)

<sup>4</sup> [www.law.cornell.edu/uscode/text/8/1611](http://www.law.cornell.edu/uscode/text/8/1611)

<sup>5</sup> <https://fas.org/sgp/crs/misc/RL33809.pdf>

Asylum seekers already have suffered trauma and many are living with PTSD. Feeling of uncertainty in their pending immigration case exacerbate this. Reducing their ability to support themselves would further increase feelings of fear, desperation, and their overall mental health. The lack of ability to work and correlating lack of income would increase a person's risk to become a public charge in the long term. Given the administration's concern over public charge, it would be prudent to avoid exacerbating the risk of becoming a public charge – yet this proposed rule increases that risk by increasing asylum seekers' financial instability.

#### The Proposed Rule Will Decrease Access to Counsel

A lack of income hinders opportunities to find and retain competent legal counsel. Studies have shown that immigrants who are represented are much more likely to win relief than those who go without representation. A 2014 study by the Stanford Law School found that detained immigrants with representation are three times more likely to win their deportation case than those without attorneys.<sup>6</sup> For asylum-seeking women and children, the odds of winning an asylum case increase fourteen-fold with legal representation.<sup>7</sup> The most current research, released in November 2017, shows that in the first three years of the New York Immigration Family Unity Project (NYIFUP), which follows the universal representation model, 48% of cases ended successfully – meaning clients won the right to stay legally in the United States. This is a 1,100% increase from the observed 4% success rate of unrepresented cases before NYIFUP.<sup>8</sup> Put another way, for every 12 people who received counsel, 11 would have been deported without the attorney that was provided – at no cost to them – through the NYIFUP program.

Without income to hire private counsel, asylum seekers must rely on immigration legal services nonprofits – like members of HILSC – who are already at capacity and under-resourced.

#### The Proposed Rule Will Hurt Victims of Natural Disasters

Houston was hit by a five-hundred-year storm in 2017, and then by a Tropical Storm in 2019. The damage of Hurricane Harvey and Tropical Storm Imelda are still being felt in our communities. Immigrants, including asylum seekers, are more vulnerable when natural disasters hit and delays to work permits mean that asylum seekers cannot access income to help alleviate some of the harm caused by these disasters. In the wake of natural disasters, it is imperative that families have access to income to help them recover from their lost homes and property. Any longer delays to access employment are critical in the time following a disaster.

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<sup>6</sup> See Key Findings of “Access to Justice for Immigrant Families and Communities: Study of Legal Representation of Detained Immigrants in Northern California.” Available: <https://media.law.stanford.edu/organizations/clinics/immigrant-rights-clinic/11-4-14-Access-to-Justice-Report-FINAL.pdf>

<sup>7</sup> See Syracuse University's TRAC report: <http://trac.syr.edu/immigration/reports/396/>

<sup>8</sup> Vera, Evaluation of the New York Immigrant Family Unity Project, Nov. 2017. Available: <https://www.vera.org/publications/new-york-immigrant-family-unity-project-evaluation>

The Houston Immigration Legal Services Collaborative was active in providing information and assistance to immigrant communities during and after Hurricane Harvey.<sup>9</sup> We answered questions on Spanish-language media, hosted a Frequently Asked Questions website that was widely referred to by our member and stakeholder agencies (including the City of Houston), and we utilized our established immigrant rights hotline as a resource to provide information about Harvey relief and recovery efforts in multiple languages. HILSC also provided grants to partners to provide direct cash assistance to families still recovering from Harvey. We also provided a FAQ website to our members for Tropical Storm Imelda. We assisted huge numbers of immigrants and asylum seekers who looked to us to help fund assistance after the storm.

Despite our work and that of our partners, a study showed that during Harvey, immigrants were disproportionately impacted and less likely to seek assistance than their native-born counterparts.<sup>10</sup> About three-quarters (74 percent) of Houston area immigrants were affected by some type of property damage to their home or vehicle and/or some form of job or income loss, compared to 63 percent of native-born residents.<sup>11</sup> Foreign-born residents were disproportionately more likely to report financial difficulties in the months and years following Harvey; compared to residents born in the United States, “immigrants affected by Harvey were significantly more likely to say that they or any other adult in their household had fallen behind in paying their rent or mortgage since the storm (39 percent versus 24 percent).”<sup>12</sup> In addition to facing financial difficulties, immigrants are more likely to have difficulty accessing health care following a natural disaster. After Hurricane Harvey, for instance, about a quarter of storm-affected immigrants reported needing more help with getting the medical care they and their family needed, as compared to thirteen percent of native-born residents.<sup>13</sup>

There is also a particular danger to already-vulnerable immigrant women after a storm, as it is well documented that gender-based violence increases after disasters like hurricanes. For instance, after Hurricane Katrina, there a 45 percent increase in gender-based violence.<sup>14</sup> After Harvey, many domestic violence shelters in Houston were either full or flooded. Finding low-cost housing after Harvey was incredibly challenging. For victims of domestic violence, access to work authorization and employment opportunities are particularly important – without access to income, victims may go back to abusive partners and unsafe homes rather than be left homeless.<sup>15</sup>

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<sup>9</sup> For more information about HILSC’s work during and after Hurricane Harvey, please visit: Houston Immigration Legal Services Collaborative Website, Harvey Resource page: [www.houstonimmigration.org/harvey/](http://www.houstonimmigration.org/harvey/); and \$4M Fellowship Program Provides Post-Harvey Legal Aid, Houston Public Media (Nov. 20, 2018), *available at* <https://www.houstonpublicmedia.org/articles/news/hurricane-harvey/2018/11/20/312582/4m-fellowship-program-provides-post-harvey-legal-aid/>; and For Houston’s Undocumented Immigrants, There’s No Promise Of Disaster Relief, KERA News (Sept. 4, 2017), *available at* <http://www.keranews.org/post/houstons-undocumented-immigrants-theres-no-promise-disaster-relief>.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> Justine Calma, Here’s how anti-immigrant policies hurt hurricane recovery” *Grist* (Oct. 31, 2018), *available at* <https://grist.org/article/heres-how-anti-immigrant-policies-hurt-hurricane-recovery/>, and attached hereto for your review.

<sup>15</sup> *Id.*



Despite the disproportionate number of immigrants affected by Harvey, immigrants were less likely to report applying for government assistance after the storm. This may be because immigrants feared that seeking assistance would harm their immigration cases or that of their families. Nearly half of immigrants whose homes were damaged said they were worried that if they tried to get help in recovering from Hurricane Harvey, they would draw attention to their or a family member's immigration status.<sup>16</sup> As a result, only four in ten immigrants whose homes were damaged said they applied for disaster assistance following the hurricane, compared to two-thirds of native-born residents who said they applied.<sup>17</sup>

Even when they do seek out assistance – they may not be able to get it. As noted above, many social services programs – from community service agencies to shelters to health care centers – require some form of valid ID, proof of residency, or proof of income. Given the particular vulnerabilities of immigrants living in an area that has increasingly been experiencing storms, it is imperative that asylum seekers have access to employment authorization without delay so that they can find jobs to help them recover from past disasters and to help prepare them for the inevitable future ones.

#### Part of a Systematic Effort to Deter Asylum Seekers

This proposed rule change is part and parcel of this administration's effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

#### Conclusion

The Houston Immigration Legal Services Collaborative opposes the proposed rule. If implemented this rule will harm asylum seeking families by limiting their access to government-issued ID and income. The DHS should immediately withdraw its current proposal, and dedicate its efforts to advancing policies that strengthen—rather than undermine – the safety and security of those seeking asylum in our country.

Thank you for the opportunity to submit comments on the proposed rulemaking.

Sincerely,



Andrea Guttin  
Legal Director  
Houston Immigration Legal Services Collaborative

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<sup>16</sup> Hurricane Harvey: The Experiences of Immigrants Living in the Texas Gulf Coast (attached).

<sup>17</sup> *Id.*



# KATE VICKERY

406 Sul Ross Street; Houston, TX 77006 | 269.599.5644 | kate.vickery@gmail.com

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## EDUCATION

**Master of Public Affairs, 2014**

Lyndon B. Johnson School of Public Affairs

**Master of Science in Community and Regional Planning, 2014**

The University of Texas at Austin - School of Architecture

**BA in Anthropology & Sociology, 2005**

**Minor in Environmental Studies**

Kalamazoo College

**Study Abroad:** Chiang Mai, Thailand

## SUMMARY OF SKILLS

- Systems-level problem solving
- Strategic planning & implementation
- Collaborative leadership
- Coalition building
- Program evaluation and management
- Policy development and analysis
- Grant-making
- Research and data analysis
- Public speaking and strategic communications
- Fundraising and development
- Social media, writing for web, and print media design
- Mapping and land use design
- *Software:* Adobe Design Suite, Microsoft 365 & Office, ArcGIS, ArcGIS Online, social media, web CMS

## PROFESSIONAL EXPERIENCE

### Executive Director

**January 2016 – present**

Houston Immigration Legal Services Collaborative | Houston, Texas

- Led HILSC from informal consortium to 501c3 organization with \$2M annual budget and professional staff of three.
- Build philanthropic support for HILSC through strategic outreach to private foundations. To date, have raised \$3.8M to support operations, grant-making, and large-scale systems-level projects.
- Develop and manage strategic projects including: Immigrant Rights Hotline; community Know Your Rights outreach; deportation defense; pro se legal assistance workshops for asylum seekers; notario fraud prevention.
- Manage and facilitate decision-making for a 15-member Executive Committee and 7-member Board of Directors, made up of funders, service providers, immigration attorneys, and immigrant rights activists.
- Serve as public spokesperson for HILSC and the community of member organizations.
- Lead a unique grant-making process that puts service providers in the front-seat of decision-making, and has granted over \$2.5M over two years, with another \$1.5M planned to distribute in 2018.
- Monitor policy changes affecting immigrants; mobilize programmatic and communication responses in partnership with key stakeholders and community leaders, including: Immigrant Rights Hotline; community Know Your Rights outreach; deportation defense; legal assistance workshops; notario fraud prevention.
- Manage multi-year grants from local and national funders.
- Represent HILSC at national and local level with funders, policymakers, community partners, and peer organizations.
- Manage contract and full-time staff.

### Strategic Planning & Policy Consultant

**August 2014 – December 2015**

Various Organizations | Houston & Austin, TX

- **Houston Immigration Legal Services Collaborative** (Coordinator) – Facilitated collaboration among 40+ non-profit organizations, law schools, funders, public and private partners in the Houston region with a mission to increase the quality and quantity of immigration legal services and to improve immigrants' ability to access social and legal services. Provided strategic planning and organizational support to HILSC, which was first established in fall 2013; facilitated the development of, writing, and implementation of Community Plan; provided the core leadership functions of an executive director for the Collaborative.
- **Center for Public Policies Priorities** (GIS & Data Analyst) – Analyzed 2016 Kids Count data, produced maps conveying indicators of child well-being, including poverty, race, housing and transportation, and education.
- **Houston Local Initiatives Support Corporation** (GIS Analyst) – Conducted research on land use patterns and LISC client services to create maps to support LISC's program initiatives.
- **Galveston Bay Foundation** (Strategic Project Manager) – Facilitated organizational development through market research, property acquisition negotiation, and strategic planning for GBF's headquarters and programs.

**Urban Agriculture Planner****May 2013 – November 2013**

Sustainable Urban Agriculture &amp; Community Garden Program, City of Austin | Austin, Texas

- Managed Community Transformation Grant contract, including mini-grant program for public health initiatives.
- Managed \$112,000 CTG budget, including year-end reporting and budget revisions.
- Gave technical assistance to community gardens on public land (e.g. permitting, site analysis, and leadership).
- Performed GIS analysis of suitable parcels for community garden development.
- Provided regular testimony to the Sustainable Food Policy Board, a city/county advisory board to City Council.
- Co-chaired a working group to recommend changes to the land development code's regulations of urban farms.
- Represented SUACGP in cross-department working groups, implementing the City of Austin's comprehensive plan.

**Webinar Coordinator****August 2012 – December 2013**

National Community Land Trust Network | Portland, Oregon

- Coordinated and facilitated NCLTN trainings with experts in the fields of housing policy and community land trusts.

**Program Assistant****August 2012 – May 2013**

Austin Parks Foundation | Austin, Texas

- Planned and coordinated APF programs, facilitating public/private partnerships.
- Secured \$200,000 grant from St. David's Foundation for healthy living programming in a low-income neighborhood.
- Developed strategies for grants, solicitations, and fundraising programs/events.
- Developed content for and promoted APF through website and social media.

**Legislative Intern****May 2012 – July 2012**

American Civil Liberties Union of Texas | Austin, Texas

- Conducted research on criminal law reform and juvenile justice policy issues in preparation for legislative session.
- Represented ACLU-TX with legislators and aids when lobbying on behalf of criminal and juvenile justice reform.
- Contributed research and strategy to policy priorities for reforming the Texas Department of Criminal Justice.
- Organized a new juvenile justice coalition and published on the ACLU Liberty Blog.

**Development & Communications Director****July 2011 – May 2012**

Texas Land Conservancy | Austin, Texas

- Provided strategic, administrative, and organizational leadership to the organization in partnership with ED.
- Led impetus for overhauling the strategic plan, launching a multi-year conservation planning process.
- Raised funds through annual campaigns, major gift cultivation, and grant writing.
- Created and published online/print publications, including annual reports, press releases and marketing materials.
- Planned and coordinated all Board of Directors activities as liaison to the Board.
- Managed outreach coordinator.

**Outreach Coordinator****October 2008 – July 2011**

Texas Land Conservancy | Austin, Texas

- Improved quality and consistency of print and electronic publications and communications.
- Directed 2-year accreditation application, including researching best practices, implementing new management and programmatic policies, and improving overall organizational functions.
- Increased membership, event quality and quantity, and funds raised.
- Improved board governance processes through policy, creating new committee structure, and fundraising training.

**Admission Counselor****July 2005 – July 2007**

Kalamazoo College | Kalamazoo, Michigan

- Led public relations, territory management, travel, and applicant evaluation for high school students from 23 states.

## PUBLICATIONS & WRITING

- **Author:** *Houston Chronicle*, "Six basic facts about refugees and Houston," December 8, 2015
- **Co-author:** Donovan, J., Madore, M., Randall, M., Vickery, K. (2014). "Best Practices and Challenges for Farmers Market Incentive Programs: A guide for Policy makers and Practitioners." *Graduate Journal of Food Studies*, vol. 1.
- **Author:** Professional Report for MSCRP/MPAFF, "Barriers to and Opportunities for Commercial Urban Farming: Case Studies from Austin, Texas and New Orleans, Louisiana" (May 2014)
- **Researcher & Co-author:** LBJ School of Public Affairs, "Understanding and Addressing Youth Violence in the Texas Juvenile Justice Department" (May 2013)
- **Researcher & Co-author:** LBJ School of Public Affairs, "Nutrition Assistance Incentive Programs and Increasing Local Food Access for Low-Income Communities" (May 2013)
- **Researcher:** LBJ School of Public Affairs, "Bi-national Water Quality Management in the Lower Rio Grande/Rio Bravo" (2011-2012)

## OTHER PROFESSIONAL & VOLUNTEER EXPERIENCE

- **Executive Committee Member**, Mayor's Advisory Council of New Americans, Houston, TX (2016-present)
- **Co-chair**, Welcoming Houston Taskforce, Houston, TX (2016-2017)
- **Teaching Assistant**, *Topics in Sustainable Development*, University of Texas, Austin, TX (Spring 2014)
- **Volunteer & Community Advisory Council**, Urban Roots, Austin, TX (2009-2014)
- **Board Member**, Wheatsville Co-op, Austin, TX (2009-2014)
- **Co-chair**, Codes and Metrics Working Group, Sustainable Food Policy Board, Austin, TX (April – November 2013)
- **Steering Committee & Founding Member**, Austin Cooperative Business Association, Austin, TX (2011-2013)
- **Teaching Assistant**, *Introduction to GIS*, University of Texas School of Architecture, Austin, TX (Fall 2013)
- **Contract GIS Analyst**, Austin, TX (Summer 2012)
- **Member**, Harvey Milk Society, LBJ School of Public Affairs, Austin, TX (2011-2012)
- **Application Reader**, University of Texas at Austin, Austin, TX (2008-2011)
- **Grad Student & Research Apprentice**, Johns Hopkins University, Dept. of Sociology, Baltimore, MD (2007-2008)
- **Teaching Assistant**, *Introduction to Sociology*, Kalamazoo College, Kalamazoo, MI (Fall 2004)
- **Intern**, Sustainable Development Foundation, Thailand (Spring 2004)
- **Wilderness Program Guide**, Kalamazoo College, Kalamazoo, MI (Summer 2002, 2004, 2008)
- **Intern**, World Bank, Washington, D.C. (Summer 2003)

## PUBLIC SPEAKING (SAMPLE)

- **Presenter**, Grantmakers Concerned with Immigrants and Refugees (GCIR) National Convening, "What Are My Rights? Expanding and Scaling Immigration Legal Services," Los Angeles, CA (February 2018)
- **Presenter**, UTMB Health's Who Cares for the Health of Migrants? Conference, "Documentation and Legal Status Panel," Galveston, TX (October 2017)
- **Moderator and Co-Organizer** (with Kinder Institute for Urban Research), "Undocumented City" (September 2017)
- **Presenter**, Welcoming America's Welcoming Communities Gathering for Texas Leadership (July 2017)
- **Presenter and Co-Organizer** (with Center for Migration Studies), "Conference: Mobilizing Coherent Community Responses to Changing Immigration Policies," South Texas College of Law Houston (June 2017)
- **Presenter**, Yale Food Systems Symposium, "Gentrification, Race and Urban Agriculture: Planning a Local Food System in a Rapidly Growing City," Yale University (October 2013)
- **Panelist**, South By Southwest Eco, "The Future of Urban Farming: Grow More with Less," Austin, TX (October 2013)

## MEDIA MENTIONS (SAMPLE)

- Christian Science Monitor, "Can Houston find path to recovery that doesn't leave poor behind?" Sept. 18, 2017
- BBC World Service, "Seeking Refuge in Houston," September 10, 2017
- Governing, "Harvey Has Made Houston More Immigrant-Friendly, But for How Long?" September 6, 2017
- KERA News, "For Houston's Undocumented Immigrants, There's No Promise Of Disaster Relief," September 4, 2017
- VICE, "Harvey Has Hit Undocumented Immigrants Worst of All," August 30, 2017
- Houston Chronicle, "Houston's immigrant rights hotline receives hundreds of calls," March 21, 2017
- Fox26, "Thousands of undocumented immigrants in Houston area reeling from Supreme Court ruling," June 24, 2016
- ABC13, "VIVA Houston TV Segment," March 26, 2017

## **Andrea Guttin**

4899 Montrose, Unit 701 | Houston, TX 77004 | (713) 775-2588 | aguttin@gmail.com

*Admitted to practice in Texas, New York, and Georgia*

### **LEGAL EXPERIENCE**

#### **Houston Immigration Legal Service Collaborative (HILSC)**

Houston, Texas | Legal Director, October 2016 – Current

- Provides leadership on The Collaborative's implementation of coordinated responses to changes in immigration policy and law (e.g. DACA, Travel Ban, SB4, Asylum, Separated Parents).
- Oversees HILSC's legal initiatives across Houston with various partners and stakeholders, for example:
  - Manages the design and implementation of Deportation Defense Houston, a collaborative project across four HILSC partners to provide free representation to detained immigrants;
  - Convenes partners through the Crime Victims Working Group to work with local law enforcement to create more immigrant-friendly policies;
  - Created and manages the Immigrant Rights Hotline, including providing hotline staff with trainings and up-to-date legal updates and referrals information to pass on to callers;
  - Coordinates the Notario Fraud Prevention Working group, which brings together attorneys, government officials, and advocates to end fraud perpetrated on immigrants;
- Supports implementation of Collaborative workshops and coordinated efforts to serve discrete immigrant communities, such DACA renewals, family preparedness, pro se asylum, and others;
- Provides technical assistance to HILSC member legal services providers on issues from Department of Justice Recognition & Accreditation to malpractice insurance and salary guidelines;
- Quickly mobilizes networks to respond to crises, such as end of DACA and Hurricane Harvey
- Expands pro bono interest in immigration work through leading trainings and CLE presentations;
- Provides immigration presentations to professional associations, attorneys, and the general public;
- Represents and serves as spokesperson for HILSC to the general public and nonprofit community, including through appearances on Spanish- and English- language media.
- Updates Houston's immigration legal community about legal changes in policy, law, and practice;
- Works with the Executive Director in setting the vision and strategic planning for HILSC.

#### **Human Rights First**

Houston, Texas | Interim Managing Attorney, February 2016 – October 2016

- Managed the pro bono legal representation of 90 asylum and other clients in the Houston office;
- Supervised a staff of four including legal fellow, social worker, and legal service coordinators, plus interns;
- Provided direct legal representation in affirmative and defensive asylum claims before the Houston Asylum Office, as well as the Houston Immigration Court;
- Provided pro bono attorneys with legal and procedural support on asylum cases through trainings, reviewing draft submissions, legal memoranda, affidavits, and other evidence in support of asylum claims;
- Built a Houston-based pro bono attorney network and promoted pro bono representation;
- Conducted advocacy on behalf of asylum seekers by meeting with local government officials;
- Lead efforts to maintain and secure funding for program activities and ensured necessary information was tracked and reported throughout the year; and
- Built and maintained relationships with legal services providers, law schools, and community groups.

## **Andrea Guttin**

4899 Montrose, Unit 701 | Houston, TX 77004 | (713) 775-2588 | aguttin@gmail.com

Houston, Texas | Staff Attorney, September 2015 – February 2016

- Managed the pro bono legal representation of 45 asylum and other clients in the Houston office by providing procedural and substantive legal support to attorneys representing asylum seekers;
- Represented individuals before the Immigration Court, asylum office, and state courts;
- Drafted briefs, pleadings, and affidavits for immigration litigation and state court proceeding; and
- Conducted intakes with prospective clients and prepared their claims for pro bono placement.

New York, New York | Associate Attorney, April 2012 – September 2015

- Provided know-your-rights trainings and individual consultations to detained asylum seekers;
- Represented individuals, including children and detained families, in proceedings before the Immigration Court, asylum office, and state courts;
- Coordinated liaison meetings with government officials on detention issues; and
- Participated in group led by Judge Chagares of the U.S. Court of Appeals for the Third Circuit.

**The Door, New York, New York** | Volunteer Attorney, February 2012 – June 2012

- Drafted pleadings and affidavits for minors in immigration removal proceedings.

**LatinoJustice PRLDEF, New York, New York** | Volunteer Attorney, November 2011 – March 2012

- Researched and prepared memoranda on class certification, and unlawful searches and seizures.

**Georgia Legal Services Program, Savannah, Georgia** | Staff Attorney, March 2010 – August 2011

- Represented clients in state and administrative courts on issues ranging from consumer rights to social security disability, and family court issues;
- Prepared wills and advanced directives for elderly clients and powers of attorneys for minors; and
- Drafted complaint to the Food and Nutrition Service's Office of Civil Rights based on non-compliance with Title VI of the Civil Rights Act in its implementation of food stamps (SNAP).

**American Civil Liberties Union of Texas, Austin, Texas** | Student Fellow, August 2008 – May 2009

- Researched the impact of detainers on the immigrant community and local jails in Texas; and
- Assisted in discovery and interrogatories for lawsuit on immigration detention conditions.

## **EDUCATION**

**The University of Texas School of Law, Austin, Texas**

Juris Doctor (with honors), May 2009

**The University of Texas, Lozano Long Institute of Latin American Studies, Austin, Texas**

Master of Arts, May 2009

*Thesis:* "Criminals, Immigrants, or Victims? Rethinking the Criminal Alien Program."

**The University of Texas, Austin, Texas**

Bachelor of Arts (with honors) in English and History, Minor in Spanish, May 2003

## **LANGUAGES**

Native Spanish speaker. Basic reading, writing and conversation in Hebrew.



**Julie Marie Pasch**  
julie@houstonimmigration.org (713) 261-5911

### **Relevant Experience**

**Deportation Defense Houston, Houston Immigration Legal Services Collaborative, Houston, TX**  
*Managing Attorney, Deportation Defense Houston, October 2018-present*

Provide technical assistance and mentorship to attorneys at member organizations representing detained immigrants; create systems to streamline case management, data collection, and reporting; develop new initiatives and trainings; manage relationships with stakeholders, including local, state and federal government officials, nonprofits, and grassroots community organizations

**South Texas Pro Bono Asylum Representation Project (ProBAR), Harlingen, TX**  
*Director, Adult Detention Project (previous title Managing Attorney), June 2015-October 2018*

Supervised between five and nine staff attorneys, DOJ Accredited Representatives, paralegals, and administrative assistants, including training and mentoring new staff; managed Legal Orientation Program at two immigration detention centers and ensure compliance with contractual obligations; wrote yearly, quarterly and monthly grant reports for multiple grants; represented detained and non-detained immigrants before the immigration court, BIA, and USCIS; recruited and mentored *pro bono* attorneys

*Staff Attorney, December 2014-June 2015*

Represented detained and non-detained immigrants in removal proceedings and in applications with USCIS; provided Know-Your-Rights presentations to detainees at the Port Isabel Detention Center; developed and conducted *pro se* assistance workshops for detained asylum and cancellation of removal applicants; recruited and mentored *pro bono* attorneys

**Catholic Charities of Galveston-Houston, Cabrini Center for Immigrant Legal Assistance, Houston, TX**  
*Staff Attorney, May 2013-December 2014*

Represented applicants in affirmative and defensive asylum proceedings; implemented formal *pro bono* referral system; mentored *pro bono* attorneys representing asylum applicants; represented victims of crimes in applications for U status and relief under the Violence Against Women Act; organized and led Citizenship Workshops for one hundred or more *pro se* naturalization applicants

**National Immigrant Justice Center, Chicago, IL**  
*Postgraduate Fellow, Detention Project and Federal Litigation Project, October 2012-May 2013*

Represented detainees in removal proceedings at Chicago Immigration Court, including asylum, cancellation of removal, and adjustment of status applications; conducted intakes in detention centers and via telephone; prepared filings for federal litigation; drafted affidavits in support of class action suit challenging detention conditions

### **Legal Externships/Volunteer Work**

**Center for Applied Legal Studies, Georgetown University Law Center, Washington, DC**  
*Law Student Representative, Spring 2012*

**Catholic Legal Immigration Network, Inc. (CLINIC), Washington, DC**  
*Legal Intern, Religious Immigration Services, Summer 2011; Legal Assistant March 2012-May 2012*

**Executive Office for Immigration Review – Arlington Immigration Court, Washington, DC**  
*Legal Intern, Fall 2011*

**Farmworker Justice, Washington, DC**  
*Extern, Spring 2011*

**Human Rights Initiative of North Texas, Dallas, TX**  
*Legal Intern, Refugee and Asylum Program, Summer 2010*

**Capital Area Immigrants' Rights Coalition, Washington, DC**  
*Detention hotline volunteer, Fall 2009-Fall 2010*

### **Education**

**Georgetown University Law Center, Washington, DC**  
Juris Doctor, May 2012; Certificate in Refugee and Humanitarian Emergencies  
*Journal: Georgetown Immigration Law Journal*  
Article Selection Editor (2011-2012); Assistant Article Selection Editor (2010-2011)  
*Awards: CALI Award, Best Paper, International Migration and Development, Fall 2011*

**Rhodes College, Memphis, TN**  
Bachelor of Arts, *cum laude* in International Studies, awarded May 2008; French minor

### **Other**

**Bar Admission:** Illinois

**Languages:** Fluent in French, proficient in Spanish

**Publications:** Current Development: Developments in the Judicial Branch: Virginia Supreme Court Decision *Commonwealth v. Morris* Limits Immigrants' Access to Review of Convictions Leading to Removal Proceedings, *Georgetown Immigration Law Journal* (2011)  
"State Obligation to Punish Core International Crimes and the Proposed Crimes Against Humanity Convention" in *On the Proposed Crimes Against Humanity Convention*, Morten Bergsmo and Tianying Song, eds., Torkel Opsahl Academic ePublisher (2014)

# Paola Elizabeth Guzman, MSW

7373 Ardmore Street, Apt 1482 | Houston, TX 77054 | [pguzman323@gmail.com](mailto:pguzman323@gmail.com) | (424) 209-5254

## WORK EXPERIENCE

### **HILSC**

Houston, TX

September 2018-Present

#### *Program Coordinator*

- Manage events with partners in the following working groups: know your rights, notario fraud prevention and the immigrant rights hotline as well as workshops, presentations, and conferences to expand relationships with HILSC members and stakeholders
- Ensure that HILSC members and volunteers are informed on immigration news and updates through weekly emails, information flyers, the HILSC website

### **Kids in Need of Defense**

Houston, TX

May 2017-September 2018

#### *Social Services Coordinator*

- Holistic and trauma informed case management to stabilize client needs for children ranging from 1 month to 19 years old and their families; client needs varied from basic needs, mental health resources to assistance in medical connecting to medical services for chronic disorders/diseases
- Work nationally with social services coordinators in 10 KIND offices to create a national knowledge base that contains protocols and procedures for social services team as well as locally by establishing connections to organizations that are willing to provide services to KIND clients; coordinate referrals to services and follow up when necessary
- Creation and presentation of trainings for attorneys regarding trauma, child development, self-care, etc in support of a child's legal case and to enable a holistic approach when working with unaccompanied minors

### **Pathways Community School**

Los Angeles, CA

June 2015-May 2017

#### *Wellness Coordinator*

- Establish relationships to facilitate access between families, students, and staff to community service agencies for medical and mental health services within the South Los Angeles community
- Coordinate interventions with teachers and administrative staff for students who are behaviorally challenged (i.e. fighting, instigating fights, ditching, drug use); common interventions include classroom management techniques, student success meetings, parent meetings, and referrals to agencies for counseling, etc
- Develop trainings and presentations for teachers and students regarding a plethora of topics for monthly teacher professional development or as needed for student's advisory classes topics include trauma sensitive care, restorative justice, self-sabotage vs. self-care, professionalism, etc.

### **St. Vincent's Church**

Los Angeles, CA

May 2016-May 2017

#### *Confirmation and Youth Coordinator*

- Prepare weekly youth group meetings including icebreakers and activities on various topics like sexuality, harassment, music, immigration, college, and other relevant topics
- Support and supervise catechist of confirmation to support the faith development of youth ages 13 to 17
- Perform outreach and market youth group and confirmation program in order to recruit new members from the congregation to diversify participants in youth group and confirmation program
- Coordinate monthly outings to provide service in the form of feeding the homeless, cleaning Azusa Lake, or creating and delivering Christmas cards to the elderly in order to build relationships with community and sharpen youth social skills and spirit of caring

### **St. Mary's Academy**

Inglewood, CA

July 2011 - June 2012

#### *Alumnae Coordinator*

- Plan fundraising events (fashion show, donor dinner, "Ties That Bind and Build", derby day, etc.) to increase financial revenue and alumnae participation
- Create and led committees for events between current students and alumnae for fundraising events and career days, guest speakers, etc.
- Train high school aged students in correct dining etiquette, public speaking, and networking with donors and alumnae

AR002153



# Paola Elizabeth Guzman, MSW

7373 Ardmore Street, Apt 1482 | Houston, TX 77054 | [pguzman323@gmail.com](mailto:pguzman323@gmail.com) | (424) 209-5254

## EDUCATION

**University of Southern California** Los Angeles, CA May 2015  
*Master of Social Work*  
*Concentration: Community Organization, Planning, and Administration*

**Mount St. Mary's College** Los Angeles, CA May 2011  
*Bachelor of Arts in Sociology (Social Services) and Spanish (Translations)*

## SKILLS

Fluent in Microsoft Office, Google Software, Event Planning, and social media  
Fluent in Spanish (reading, writing, speaking)

## TRAININGS AND CERTIFICATES

Diversity awareness/sensitivity training  
Strategic planning/theory of change intensive  
Crisis Intervention  
Motivational Interviewing (MI)  
Problem Solving Therapy (PST)  
Seeking Safety (SS)  
Behavior Safety Care Emergency Training (B-SET)  
CPR/First Aid Certified  
Basic Life Support Certified  
Virtus Trained

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d57-4sux <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0508

Comment Submitted by Robin Courser

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## Submitter Information

**Name:** Robin Courser

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## General Comment

Support your President!

AR002155

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-zu54
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0509

Comment Submitted by James Ellis

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## Submitter Information

**Name:** James Ellis

---

## General Comment

WE do NOT need anymore illegal immigrants in the United States of America! Cut the numbers way back and verify each and everyone is who they are claiming to be!

AR002156

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-47iv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0510

Comment Submitted by Dolores Rush

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## Submitter Information

**Name:** Dolores Rush

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## General Comment

Pres. Trump need help & support to secure our borders. I do not agree all should be allowed in. I am first generation in the US both parents waited and came here legally through the front door. They did not sneak in line and crawl in like a thief through the back door. Respect and reward must be given to those who follow my parents footsteps.

AR002157

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-m5t3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0511

Comment Submitted by David Widmer

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## Submitter Information

**Name:** David Widmer

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## General Comment

My mother immigrated to U.S. legally in 1923 from Switzerland. My father's parents immigrated, (also from Switzerland!) in 1890's, legally. Coming to this country should be not-so-easy; should be a privilege, therefore being something to work for proudly! It should remain so! Let's be fair to those seeking to come here the correct way. Those trying to "break in line" should not be able to cheat those who are following the rules!

AR002158

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-q9kd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0512

Comment Submitted by Carmela Remsen

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## Submitter Information

**Name:** Carmela Remsen

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## General Comment

We have got to take back our Country. Since that terrorist, OBAMA, OUR COUNTRY HAS GONE TO HELL!!! I refuse to change my ways of eating or how I pray, etc. to listen to those brain dead muslims. Our state of California has now gone to hell. I am on the committee to recall him.

AR002159

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d57-gxd0 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0513

Comment Submitted by Barry Jordan

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## Submitter Information

**Name:** Barry Jordan

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## General Comment

Please support Pres. Trumps immigration reforms and stop the craziness at the border!

AR002160

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-16al
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0514

Comment Submitted by Christa Wilson

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## Submitter Information

**Name:** Christa Wilson

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## General Comment

When will you start protecting the American people??? This insanity has to stop!!

AR002161



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-g2mo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0515

Comment Submitted by Ellen Collins

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## Submitter Information

**Name:** Ellen Collins

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## General Comment

Please close the gaps and defend our borders from illegal immigrants!!

AR002162

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d57-f94d <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0516

Comment Submitted by Michael Hill

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## Submitter Information

**Name:** Michael Hill

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## General Comment

Remove the loop holes support Trumps immigration efforts

AR002163

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-5vyn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0517

Comment Submitted by Michael Hines

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## Submitter Information

**Name:** Michael Hines

---

## General Comment

We need to fix our immigration laws now. Sooner rather than later. No chain immigration. No birthright immigration. No holding areas \_ either they pass or fail at the boarder. Start tracking temporary visas and export when expired. No more H-1B visas. Build a wall to keep out illegals. There's a lot to do, it's time to get busy.

AR002164

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-ezju
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0518

Comment Submitted by Gail Schaaf

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## Submitter Information

**Name:** Gail Schaaf

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## General Comment

I earnestly request that you support President Trump's immigration reforms. We need a change from the absurd laws which we have now. Make America safe!!!

AR002165

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d57-4zq0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0519

Comment Submitted by Barbara Domek

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## Submitter Information

**Name:** Barbara Domek

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## General Comment

Please stop illegals from coming into our country. And, deport everyone who's already here illegally!  
Thank you Mr President!  
Barb Domek

AR002166

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d56-z7xr <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0520

Comment Submitted by Richard Samuelson

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## Submitter Information

**Name:** Richard Samuelson

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## General Comment

Stop illegal immigration now.

AR002167

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-wzln
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0521

Comment Submitted by Sher Bash

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## Submitter Information

**Name:** Sher Bash

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## General Comment

SEND THEM RIGHT BACK OUT IF YOU DON'T MEET THE DEADLINE. DON'T LET THEM GO FREE IN USA! A DEADLINE CAN'T BE MET, SO BYE-BYE- GO HOME- GET OUT! WHY SHOULD AMERICANS PAY TO HOUSE THEM.

AR002168

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d56-etjx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0522

Comment Submitted by Rebecca Williams

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## Submitter Information

**Name:** Rebecca Williams

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## General Comment

Please support our President with immigration reform!  
President Trump supports us; the American people.  
Thank-you!  
Rebecca

AR002169



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-n7xb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0523

Comment Submitted by Roxann Hardin

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## Submitter Information

**Name:** Roxann Hardin

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## General Comment

I want my legislators to Support President Trump's Immigration Reforms Now!!!

The Immigration issue needs to be dealt

with as President Trump has requested. Please support the Presidents stance on immigration. We need to keep America safe!!!!

AR002170

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-5cea
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0524

Comment Submitted by Lee Belanger

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## Submitter Information

**Name:** Lee Belanger

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## General Comment

Its time to support President Trump and his immigration. We need to Protect and secure our Border. We are not the World's Daycare for illegal immigrants, we need to take care of Americans, First. The Dems, need to stop acting like poor losers, and get on board, the Trump Train.

AR002171

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d56-8ibq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0525

Comment Submitted by Tom Twiss

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## Submitter Information

**Name:** Tom Twiss

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## General Comment

Let President and his Administration have all the time they need to vet Immigrants. Please write your comment here.

AR002172

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-2ers
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0526

Comment Submitted by Troy Musgrove

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## Submitter Information

**Name:** Troy Musgrove

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## General Comment

Please support President Trump's Immigration Reforms for the good of the Nation and the American People.

AR002173

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-czbt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0527

Comment Submitted by Craig Keate

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## Submitter Information

**Name:** Craig Keate

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## General Comment

The processing of immigrants for asylum is compromising the ability of legal immigrant applications for entry into the country. Please act to resolve this great inequity.

AR002174

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-a9xu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0528

Comment Submitted by Stacy Grenier

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## Submitter Information

**Name:** Stacy Grenier

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## General Comment

I support president Trump's immigration reform you should too or we wont elect you

AR002175

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-o746
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0529

Comment Submitted by Delphine Kappen

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## Submitter Information

**Name:** Delphine Kappen

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## General Comment

We must have immediate immigration reform. Go back to the application process not entering the country until authorized All illegals including DACA be sent back n out of this country immediately!!!! No assistance to illegals at all

AR002176

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-9sgk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0530

Comment Submitted by Gopalreddy Boreddy

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## Submitter Information

**Name:** Gopalreddy Boreddy

**Address:**

23697 sailfish square  
ashburn, VA, 20148

**Email:** venugopal.stiffler93@gmail.com

**Phone:** 571-332-2002

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## General Comment

Am an Assylum seeker, i have a BACHELORS AND ALSO A MASTERS DEGREE, am mainly intrested in IT CAREER, now am in such situation that i dont have support from my parents, and am not working since 3 months, no money to take care of my family if you can please help me it will be a great help for me..

AR002177



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-44z8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0531

Comment Submitted by Robin Gonsalves

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## Submitter Information

**Name:** Robin Gonsalves

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## General Comment

The support for this POTUS is a support for "We the People" and that equals a support for America and Americans.

To do otherwise is an act of defiance to the will of the people...

AR002178

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-8vxy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0532

Comment Submitted by Russell Shannon

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## Submitter Information

**Name:** Russell Shannon

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## General Comment

The ignorant Left DON'T care about our country or it's citizens. I wish we could abolish the Whole Democratic party, they are WORTHLESS

AR002179

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-yloy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0533

Comment Submitted by Marleen Asbury

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## Submitter Information

**Name:** Marleen Asbury

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## General Comment

Support President Trumps immigration reform we must build wall.

AR002180

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d56-2rxp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0534

Comment Submitted by Frances Perry

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## Submitter Information

**Name:** Frances Perry

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## General Comment

Let's follow President Trump in saving our country. He is trying hard and we need to support him.

AR002181

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-smgu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0535

Comment Submitted by Patsy Stringer

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## Submitter Information

**Name:** Patsy Stringer

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## General Comment

You people need to do what you get paid for doing! Try working ror a change because you dont have much time left in office

YOU WILL BE VOTED OUT!!

AR002182

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-gd9k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0536

Comment Submitted by Caroljean Valles

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## Submitter Information

**Name:** Caroljean Valles

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## General Comment

Support President Trump's immigration reforms . We have far too many illegals. We need to take care of our citizens . .

AR002183

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-cypj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0537

Comment Submitted by Joyce Foss

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## Submitter Information

**Name:** Joyce Foss

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## General Comment

Please be a loyal American and back President Trump!  
Lets work together to keep America the greatest nation of all!

AR002184

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d56-riuv <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0538

Comment Submitted by Jacqueline Magnuson

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## Submitter Information

**Name:** Jacqueline Magnuson

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## General Comment

Stop the merri-go-round and do business with integrity. WE THE People would like an honest days work. We need our nation to be safe as well as compassionate. Thank You

AR002185



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d56-6uhj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
---

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0539

Comment Submitted by Daniel Pelkowski

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## Submitter Information

**Name:** Daniel Pelkowski

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## General Comment

So your jobs on immigrationreform, or "We the People" will!

AR002186

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d56-gdzi <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0540

Comment Submitted by US Senator Kirsten Gillibrand

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## Submitter Information

**Name:** Emma Mondadori

**Submitter's Representative:** Emma Mondadori

**Government Agency Type:** U.S. Senate

**Government Agency:** Senator Kirsten Gillibrand

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## General Comment

Good afternoon,

Attached please find a public comment from US Senator Kirsten Gillibrand regarding the USCIS proposed rule: Removal of 30-Day Processing Provision for Asylum Applicants.

Thank you in advance for your time and attention to this matter.

Sincerely,

Emma Mondadori

---

## Attachments

KEG Public Comment re USCIS Removal of 30-Day Processing Provision for Asylum Applications (11.4.19)

AR002187

# United States Senate

WASHINGTON, DC 20510-3205

November 4, 2019

The Honorable Ken Cuccinelli  
U.S. Citizenship & Immigration Services  
20 Massachusetts Avenue N.W.  
Washington, D.C. 20529

Docket No. USCIS-2019-0001

Dear Mr. Cuccinelli,

I write today in opposition to the U.S. Citizenship & Immigration Services' ("USCIS" or the "Department") proposed rule "Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications." If implemented, this rule would have an immediate and detrimental impact on asylum seekers and their ability to achieve self-sufficiency. In the last year alone, my office has received approximately 450 requests for casework assistance from New Yorkers who were at risk of losing their jobs because of delays in the processing of employment authorization documents ("EAD"). Rather than also subjecting asylum seekers to these prolonged processing times, the 30-day processing provision should remain in place, and USCHS should make efforts to decrease processing times for *all* applicants by hiring and training additional adjudication officers.

Asylum seekers are, by nature, a vulnerable population; they have fled their country of origin due to a well-founded fear of persecution, and are seeking safety and refuge in the United States. Asylum seekers must currently wait 150 days after applying for asylum before requesting an EAD, and are considered *non-qualified aliens*, ineligible for virtually all forms of federal assistance available to households or individuals.<sup>1</sup> Asylum seekers become increasingly vulnerable to homelessness and abuse or exploitation as undocumented workers when they are unable to work legally.<sup>2</sup> Without a valid work permit, asylum seekers are also unable to obtain other benefits crucial to their self-sufficiency like drivers licenses, health care, and legal representation.

Between FY 2010 and FY 2018, the number of EAD applications filed with USCIS has grown by 63 percent.<sup>3</sup> According to the USCIS Ombudsman, this increase in filings, paired with insufficient staffing resources and technology challenges, has directly contributed to an increase in processing times for all EAD applicants.<sup>4</sup> These increased processing times place a significant financial strain on applicants, their employers, and the US economy as a whole. In its proposed rule,

<sup>1</sup> <https://fas.org/sgp/crs/misc/RL33809.pdf>

<sup>2</sup> [https://www.humanrightsfirst.org/sites/default/files/Work\\_Authorization.pdf](https://www.humanrightsfirst.org/sites/default/files/Work_Authorization.pdf)

<sup>3</sup> [https://www.dhs.gov/sites/default/files/publications/dhs\\_2019\\_ombudsman\\_annualreport\\_verified.pdf](https://www.dhs.gov/sites/default/files/publications/dhs_2019_ombudsman_annualreport_verified.pdf)

<sup>4</sup> *Ibid.*

USCIS acknowledges that a removal of the 30-day processing provision would result in millions of dollars in lost wages for applicants, loss in tax revenue to the government, and potential loss to Medicare and social security.<sup>5</sup> The agency also acknowledges that it has not estimated the cost of hiring more officers as a solution to the increase in processing times.<sup>6</sup>

I urge you to consider instead the long-term benefits of keeping the 30-day timeframe in place and hiring more adjudication officers to decrease processing times for all applicants. This proposed rule would place undue harm on asylum seekers as they seek to achieve self-sufficiency in this country. USCIS was established by congress as a customer service agency; in line with that intention, I ask that you prioritize the needs of your customers, especially those who are most vulnerable.

Sincerely,



Kirsten Gillibrand  
United States Senator

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<sup>5</sup> <https://www.federalregister.gov/documents/2019/09/09/2019-19125/removal-of-30-day-processing-provision-for-asylum-applicant-related-form-i-765-employment>

<sup>6</sup> <https://www.govinfo.gov/content/pkg/FR-2019-09-09/pdf/2019-19125.pdf>

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-yftf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0541

Comment Submitted by Kimmerle Culver

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## Submitter Information

**Name:** Kimmerle Culver

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## General Comment

Please do not allow illegal aliens (the correct legal term) to freely enter our country and then live off of our taxpayer dollars, commit crimes and then be released back into our communities to commit more crimes.

AR002190

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-jmvm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0542

Comment Submitted by Lynn Simmons

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## Submitter Information

**Name:** Lynn Simmons

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## General Comment

President Trump, I support your decision 100%!

TRUMP 2020!

AR002191

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-li3l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0543

Comment Submitted by James Dewitz

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## Submitter Information

**Name:** James Dewitz

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## General Comment

Support President Trump's plan for Immigration Reform. A lot of us are watching what you do.

AR002192



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d56-sxzd <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0544

Comment Submitted by Tina Gilmer

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## Submitter Information

**Name:** Tina Gilmer

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## General Comment

SECURE our Borders

AR002193



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-1rs0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0545

Comment Submitted by Ann Williams

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## Submitter Information

**Name:** Ann Williams

---

## General Comment

Please work with President Trump to help solve the illegal immigration problem.

AR002194

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-db43
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0546

Comment Submitted by Marianne DiPasquale

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## Submitter Information

**Name:** Marianne DiPasquale

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## General Comment

I live in El Paso, Texas and have seen thousands of asylum seekers come through the El Paso area. The proposed regulation change will only cause harm to asylum seekers, their families, and the communities in which they are living. The loss of income for the asylum seekers will disable them from providing for themselves and cause them to rely upon the surrounding community for food and shelter. This will put them in a position of vulnerability to exploitation and trafficking. Additionally, by not giving them access to legal jobs an added burden is placed on the community. The change will also cause a loss in tax revenue. I see no benefit for the American people or the asylum seekers with the proposed change in regulation.

AR002195

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-du0k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0547

Comment Submitted by Mathew Moen

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## Submitter Information

**Name:** Mathew Moen

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## General Comment

Support President Trump on Immigration reform. Stop this communist act of Palose and Shift.!

AR002196

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-t25m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0548

Comment Submitted by Sami S

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## Submitter Information

**Name:** Sami S

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## General Comment

Refugee resettlement process is a human choice - and not a legal obligation - and express gratitude for the generosity of long-term government of the United States and the American people towards this option, an option that would save lives every day. But we also know from our daily experience with refugee situations around the world that more opportunities are needed to help the most vulnerable. We therefore continue to advocate for more opportunities and to thank you for your efforts to meet this humanitarian challenge. According to the resettlement to the transfer of individuals who have been forcibly displaced from their countries of origin and are still at risk in the asylum country where they are located and who need to transfer to a third country for reasons related to their health and safety of the process.

AR002197

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d56-2kvs <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0549

Comment Submitted by Frederick Gray

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## Submitter Information

**Name:** Frederick Gray

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## General Comment

Do your job. If think you'll hold on to your job the you are going. Rethink it.

AR002198

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-1lgc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0550

Comment Submitted by Phebe Ibrahim

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## Submitter Information

**Name:** Phebe Ibrahim

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## General Comment

To be the respected country that we are we need to facilitate legal immigration & completely abolish illegal immigration

AR002199

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-skwj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0551

Comment Submitted by BETH Filiowich

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## Submitter Information

**Name:** BETH Filiowich

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## General Comment

I am for LEGAL immigration for those that want to be true Americans and live by our laws.

AR002200

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-935u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0552

Comment Submitted by Jeff Bruchhauser

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## Submitter Information

**Name:** Jeff Bruchhauser

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## General Comment

We need to restore the rule of law in this country and it starts by securing our borders. Let's enforce the law and work to close the gaps in the system to prevent further drain on America while providing an attainable path to citizenship for those that have fallen through the cracks. There is a solution but we have to gain control of the situation first lets pass these reforms and get to working together again.

AR002201



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-5q8i
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0553

Comment Submitted by Aws AlRubaye

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## Submitter Information

**Name:** Aws AlRubaye

**Address:**

Houston, TX, 77063

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## General Comment

I believe we should Protect asylum seekers ability to work. Prompt access to work authorization helped these asylum seekers integrate into their new communities, achieve self-sufficiency, and fully contribute their skills. Thats why I am concerned about a proposal to eliminate a 30-day timeframe to process asylum seekers employment authorization document applications.

I believe delaying asylum seekers ability to work will have significant economic and humanitarian costs, that's why I'm opposition to the proposed rule change.

AR002202

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-8vb9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0554

Comment Submitted by Michael Melillo

---

## Submitter Information

**Name:** Michael Melillo

---

## General Comment

the current 30 day period does not allow the people responsible for our national security enough time to determine eligibility

the Business like approach is to allow people doing the job to tell us how many days are needed to ensure that our security is protected

Thank You

AR002203

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-xhyw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0555

Comment Submitted by Thomas Friedman

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## Submitter Information

**Name:** Thomas Friedman

---

## General Comment

trump, karma harris

AR002204

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-ed6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0556

Comment Submitted by Jeffrey Morgensen

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## Submitter Information

**Name:** Jeffrey Morgensen

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## General Comment

Please stop the leftist madness. Socialism has polluted them

AR002205

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-wq2p
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0557

Comment Submitted by Richard Pottinger

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## Submitter Information

**Name:** Richard Pottinger

---

## General Comment

We want you to support President Trump on immigration Harrywe want you to obey the laws of our country

AR002206

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d56-om35
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0558

Comment Submitted by KIMLAN VU

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## Submitter Information

**Name:** KIMLAN VU

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## General Comment

No more ILLEGAL IMMIGRANTS ALLOW IN THIS COUNTRY. And DEPORT ALL ILLEGAL IMMIGRANTS PLUS THEIR ANCHOR BABIES BACK TO THEIR LANDS. Period. We need to take care of our own people and rebuild our own country first before we can do that to the whole world.

AR002207

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-7xaq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0559

Comment Submitted by Katherine Anderson

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## Submitter Information

**Name:** Katherine Anderson

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## General Comment

We the People would like Congress to adhere to the President's immigration reforms & pass all that he has put forward. We know you've forgotten this but...you work for us & we didn't put you there to go against us. Pass his reforms.

AR002208

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-uhwt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

## Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

## Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0560

Comment Submitted by Sandra Wilkerson

## Submitter Information

**Name:** Sandra Wilkerson

## General Comment

Our President is the smartest President we have ever had in my lifetime. He has done more for our country than any other that I have ever known or read about. You all need to support Presidents Immigration Reforms. He is the only one in Washington that really knows what he is doing and does it correctly...as far as I and A LOT OF OTHER PEOPLE ARE CONCERNED!! Gets smart, you people in Washington and get your head out of trying to impeach our wonderful President!!! GOD BLESS US ALL!!

AR002209



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-xmvx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0561

Comment Submitted by Terry Stein

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## Submitter Information

**Name:** Terry Stein

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## General Comment

Let's try to remove the 30 day rule for immigration background checks, and extend it 120 days; a bit more realistic.

AR002210

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-hib0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0562

Comment Submitted by Anonymous Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Asylum seekers are already suffering from delayed status adjustment, why do they render it to be harder!. Petition pending candidates needs to feed themselves, their families, and what if they got sick? How are they going to get treatment. There is a controversy from US government! For instance, Flu shot, they cry to legal residents to get it to protect communities, while they are intending to leave petitioners out!. I understand that Trump is trying to cease entry to US, but there are better humane ways to do so. All people are human-beings, deserve to be treated with dignity, not conspire against their rights while they are in the least state of their weakness.

AR002211

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d55-d6rb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0563

Comment Submitted by Hannah Goldberg

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## Submitter Information

**Name:** Hannah Goldberg

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## General Comment

I work with asylum seekers and see every day their eagerness and ability to work and make a positive contribution. Work is so essential to ensuring not only their financial, but also their emotional stability, that I consider any delay to their being granted access while they await their hearings fundamentally inhumane and certainly unAmerican. Please do not overturn the 30-day processing provision that is a lifeline to so many.

AR002212

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-u933
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0564

Comment Submitted by Alicia Murray

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## Submitter Information

**Name:** Alicia Murray

**Address:**

101 Shuey Dr  
Moraga, CA, 94556

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## General Comment

I am against the removal of the 30 day requirement to grant or deny a work permit. People who come to the US seeking asylum need to get work as soon as possible. Preventing them doing so puts an undue hardship on them as they seek asylum. More importantly, as Americans we encourage independence and self-sufficiency. Why on earth would we take this away from them? It's un-American.

AR002213

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-66ac
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0565

Comment Submitted by mike LaRocca

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## Submitter Information

**Name:** mike LaRocca

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## General Comment

Support Presidents Trump immigration reforms.

AR002214

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d55-mr3u <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0566

Comment Submitted by Linda Childers

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## Submitter Information

**Name:** Linda Childers

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## General Comment

We as voters expect you to Support President Trump's Immigration Reforms!!!  
And we are not asking, we are telling you to support Trump!!!

AR002215

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-jhiv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0567

Comment Submitted by Scott Hargrove

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## Submitter Information

**Name:** Scott Hargrove

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## General Comment

The Democratic-Socialist Party wants the illegal's votes. That is how they plan to stack the deck on 2020 Election night!

AR002216

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-icfh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0568

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I have directly and indirectly benefitted from asylum after escaping persecutions in my home country to resettle in the USA and truly thankful for the opportunity to develop a peaceful life here.

I am disappointed at the proposed law that would increase USCIS processing time for asylum EADs from 30 days:

- This would impact asylees ability to become self sufficient (and not public charges!) and integrate into the society faster
- Would decrease tax income and GDP given contribution of asylees
- Increase the emotional/mental strain of resettling, taking into account that asylees are coming from undesirable conditions

My recommendation would be to decrease the waiting time to apply for an EAD from 150 days to 90-120 days thereby increasing USCIS processing time to 60-90 days and still keeping the time to work for an asylee to 180 days.

Thank you.

AR002217



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d55-7x6a <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0569

Comment Submitted by Paul Romano

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## Submitter Information

**Name:** Paul Romano

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## General Comment

Get rid of all democrats they are hurting us all.

AR002218

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-kc00
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0570

Comment Submitted by KR Mecklem

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## Submitter Information

**Name:** KR Mecklem

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## General Comment

Support President Trump's immigration reforms! We do.

AR002219

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d55-noym <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0571

Comment Submitted by Ray Miller

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## Submitter Information

**Name:** Ray Miller

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## General Comment

Support President Trump's In all He Does.....!!!!!!!!!!!!!!

AR002220

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-o4no
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0572

Comment Submitted by Jodi Hayes

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## Submitter Information

**Name:** Jodi Hayes

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## General Comment

It is of utmost importance that our elected officials stand with our President regarding immigration reform. The cost to the American citizens has been high due to blindly closing your eyes to the issues at hand. Our tax dollars were never meant to help those that come here illegally, yet that has become one of the biggest problems! This must stop!

AR002221

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-n6ou
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0573

Comment Submitted by K Parsons

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## Submitter Information

**Name:** K Parsons

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## General Comment

Why on earth, during a period of record low unemployment and under an administration hell-bent on removing public services, would we make it more difficult for new residents to work and take care of themselves and their families? Asylum seekers bring valuable skills and are capable of establishing themselves as positive contributors to their communities if only we will let them. Do not make it more difficult for asylum seekers to work.

According to Upwardly Global, asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

Do not make it more difficult for asylum seekers to work.

AR002222

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-154l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0574

Comment Submitted by Irvin Chambers

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## Submitter Information

**Name:** Irvin Chambers

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## General Comment

STOP WITH IMPEACHMENT WITCH HUNT AND GET TO WORK ON THE PEOPLES BUSINESS.

AR002223

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-d8c3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0575

Comment Submitted by Susan Boyette

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## Submitter Information

**Name:** Susan Boyette

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## General Comment

You must change the time frame of submitting forms to the officials. 30 days is not enough time.

AR002224

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-rcnc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0576

Comment Submitted by TONY DUVALL

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## Submitter Information

**Name:** TONY DUVALL

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## General Comment

Its time that we the people hold every government official responsible for their job or their vacation retreat. We need the reforms that POTUS is trying to get through this Congress. Ladies and Gentlemen you are part of the problem or part of the solution, which side do you want to be on. Please no lip job just actions will be accepted or we will reject you come 2020.

AR002225



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-mwae
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0577

Comment Submitted by Ted Proske

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## Submitter Information

**Name:** Ted Proske

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## General Comment

support POTUS Trump's Immigration reforms!

AR002226

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-oz7u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0578

Comment Submitted by Mary Johnson

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## Submitter Information

**Name:** Mary Johnson

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## General Comment

I love my President Donald J Trump and Family. I sent them my crosses.

AR002227

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-4bf0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0579

Comment Submitted by Jerry Cantrell

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## Submitter Information

**Name:** Jerry Cantrell

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## General Comment

Support the President!! This has gone on long enough!

AR002228

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-28iq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0580

Comment Submitted by John Stauter

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## Submitter Information

**Name:** John Stauter

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## General Comment

Trump is our President and he is doing everything for Americans and you should do whatever you can to help him.

Americans first!

AR002229

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-6cjh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0581

Comment Submitted by Suzanne StJohn

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## Submitter Information

**Name:** Suzanne StJohn

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## General Comment

It is insane that our government would want to represent "Illegals" and not our citizenry. Why are you willing to give them all our \$\$\$\$ and none to our vets and fellow citizenry. This is not what our Founding Fathers intended.

AR002230

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d55-txdb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0582

Comment Submitted by David Tullos

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## Submitter Information

**Name:** David Tullos

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## General Comment

I support President Trump's immigration reform.

AR002231

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-wrdz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0583

Comment Submitted by Michael penn

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## Submitter Information

**Name:** Michael penn

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## General Comment

Please support President Trumps requests to make our country safer from bad people

AR002232

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-nc2g
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0584

Comment Submitted by Joseph Carney

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## Submitter Information

**Name:** Joseph Carney

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## General Comment

For once do something that benefits taxpaying AMERICANS. It is mind boggling how our elected officials IGNORE and ENCOURAGE disobedience of our existing immigration laws. IT is your job to Protect US not ILLEGALS. Please support President Trump's immigration reforms

AR002233



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d55-n6rd <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0585

Comment Submitted by ray rosemann

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## Submitter Information

**Name:** ray rosemann

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## General Comment

Listen to OUR president. Fix immigration!!!

AR002234

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-6f4i
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0586

Comment Submitted by Dennis Howell

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## Submitter Information

**Name:** Dennis Howell

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## General Comment

Outlaw the DNC!!!!  
Anti American trash.....

AR002235

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d55-ms0f <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0587

Comment Submitted by Holly Hansen

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## Submitter Information

**Name:** Holly Hansen

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## General Comment

Please support President Trump and our Constitution

AR002236

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d55-ihlt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0588

Comment Submitted by david roeder

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## Submitter Information

**Name:** david roeder

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## General Comment

i SUPPORT ALL OF PRESIDENT TRUMPS EFFORTS TO SECURE OUR BOARDERS ----- I WILL NEVER VOTE DEMOCRAT AGAIN.

AR002237

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d55-rhs5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0589

Comment Submitted by Beth Whitmore

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## Submitter Information

**Name:** Beth Whitmore

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## General Comment

I support President Trumps immigration policies and limitations on birthright citizenship for children of illegal immigrants.

AR002238

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-yizd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0590

Comment Submitted by Ken Zavatsky

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## Submitter Information

**Name:** Ken Zavatsky

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## General Comment

I am descended from immigrants who came here legally over 100 years ago. They worked for their citizenship and my parents generation did the same. I am the 2nd from my family to go to college. All this was done legally and now I defend the U.S. as an Air force veteran. I had friends who earned citizenship by serving in the U.S military. To us, being a citizen means something. What is not earned is meaningless.

AR002239

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-1p9s
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0591

Comment Submitted by Sharon Hearn-Latal

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## Submitter Information

**Name:** Sharon Hearn-Latal

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## General Comment

Enough time wasted on misdirected government. Build the wall, support Israel, support the President of the United States of America. Let's take a real honest look at the current policies and start working on the issues that need to be rewritten, some away with, moderates..... PLUG WHOLES in the system NOW. Earn your keep. Work for the "PEOPLE" that pay your bills, via a pay check.

AR002240

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-lbvc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0592

Comment Submitted by Taylor Devore

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## Submitter Information

**Name:** Taylor Devore

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## General Comment

Please let the bureaucrats of the Trump Administration check every one of the thousands of immigrants who seek asylum here in the United States properly and orderly. This is not a request. So make the right decision NOW!

AR002241



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-s5jv <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0593

Comment Submitted by Janice Dix

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## Submitter Information

**Name:** Janice Dix

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## General Comment

We need President Trump's immigration reform "NOW"!!!  
In Jesus Name I pray!!!

AR002242

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5j-k812
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0594

Comment Submitted by Dale Carrison

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## Submitter Information

**Name:** Dale Carrison

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## General Comment

Keep our borders secure! Welcome legal immigrants not law breakers. Crossing our borders is illegal and so they are criminals. Period jail is the answer and send the criminal home. MAGA

AR002243

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-rnau
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0595

Comment Submitted by George Hall

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## Submitter Information

**Name:** George Hall

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## General Comment

Its past time to reform immigration

AR002244

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-i989
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0596

Comment Submitted by Don Paris

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## Submitter Information

**Name:** Don Paris

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## General Comment

Immigration in this country has to change.

Past immigrants came to this country without a safety net provided by government. they had to provide for themselves. We need to get back to that type of immigration and stop encouraging people to come here with their hand out. I support President Trump's immigration reforms and you should too!

AR002245

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-e6jv <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0597

Comment Submitted by Dawn Nord

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## Submitter Information

**Name:** Dawn Nord

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## General Comment

please support and strengthen legal immigration.

AR002246

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-t1p1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0598

Comment Submitted by Barbara Egan

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## Submitter Information

**Name:** Barbara egan

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## General Comment

Do your job and support President Trump's Immigration Reform

AR002247

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5e-r5hu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0599

Comment Submitted by Sharon Modlin

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## Submitter Information

**Name:** Sharon Modlin

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## General Comment

I back President Trump 100%!

AR002248

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-3g46
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0600

Comment Submitted by Joan Chandley

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## Submitter Information

**Name:** Joan Chandley

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## General Comment

Fix our immigration laws. No amnesty for for the Dreamers, most have had adequate time to apply for citizenship.

Try doing the job you were elected to do, represent the people.

AR002249



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-yult
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0601

Comment Submitted by Margaret Koch

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## Submitter Information

**Name:** Margaret koch

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## General Comment

The 2020 elections are coming soon. DC may think our silence is somehow an endorsement of their insanity. They are about to experience a tidalwave of our outrage at the voting booth. Those who refuse to support this president, our constitution, our security, and freedoms will find themselves looking for another job. We have had our fill of this insanity and as the Dems and never Trumpers are fully exposed they will experience the full measure of our anger at the voting booth. They have no idea of what's coming, and should have never believed our verbal silence was in any way supporting their toxic agenda

AR002250

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-10zx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0602

Comment Submitted by Dorothy Hipps

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## Submitter Information

**Name:** Dorothy Hipps

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## General Comment

Please support President Trump's

immigration reforms. Look seriously

AR002251

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-c7b4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0603

Comment Submitted by Nathaniel Haley

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## Submitter Information

**Name:** Nathaniel Haley

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## General Comment

Stop them from coming period. No room in the in

AR002252

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-fgeq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0604

Comment Submitted by Ann Brannan

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## Submitter Information

**Name:** Ann Brannan

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## General Comment

We need Immigration Reforms and you need to accept President Trump's reforms! I do not understand how unelected officials get to decide our future! Stand with the President!

AR002253

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-ktf3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0605

Comment Submitted by Stella Soto

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## Submitter Information

**Name:** Stella Soto

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## General Comment

I as a citizen of the United States ask you to support President Trumps Immigration Reforms

AR002254

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5l-i5si
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0606

Comment Submitted by Lana Watson

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## Submitter Information

**Name:** Lana Watson

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## General Comment

Please support President Trumps immigration reforms! We need this!

AR002255

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-mptg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0607

Comment Submitted by Anita McMurtrey

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## Submitter Information

**Name:** Anita McMurtrey

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## General Comment

I demand you support President Trump's Immigration reform policies and stop the ridiculous timelines. I, as a constituent, want every single person who enters our country strongly vetted. We cannot afford to take any chances that will jeopardize the safety and security of our civilians and our country.

AR002256

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5e-cmwi <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0608

Comment Submitted by Eugene Livesay

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## Submitter Information

**Name:** Eugene Livesay

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## General Comment

We definitely support President Trumps immigration reforms. Why? For the survival,of our nation. God bless America.

AR002257



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-wzrh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0609

Comment Submitted by Donald Parks

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## Submitter Information

**Name:** Donald Parks

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## General Comment

Back President Trump and his immigration decisions! We must curb immigrants to this country to protect our natural resources.

AR002258

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-k0a6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0610

Comment Submitted by Angela Safonoff

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## Submitter Information

**Name:** Angela Safonoff

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## General Comment

Dear Sirs: President Trump needs your cooperation on Immigration Reform. See that he gets it!

AR002259

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-z4lt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0611

Comment Submitted by Terry Brooks

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## Submitter Information

**Name:** Terry Brooks

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## General Comment

Our President has the right and duty to properly investigate all immigrants seeking work and asylum in our country through worldwide law enforcement agencies and other means and should not shorten the time period like some treasonous Congress members have proposed to do.

AR002260

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-eece
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0612

Comment Submitted by Garnett Damewood

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## Submitter Information

**Name:** Garnett Damewood

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## General Comment

Stop the deep state or be the swamp we Americans help Mr President empty.  
Build the wall for America's country like the wall you have for your safety

AR002261

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5e-cooj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0613

Comment Submitted by Steve Grimes

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## Submitter Information

**Name:** Steve Grimes

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## General Comment

I urge you to remove the current restrictions on the Trump administration regarding the screening of foreign applicants applying for work permits in the U.S.  
Thank you for your consideration.

AR002262

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-8v8p
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0614

Comment Submitted by Morris Whitwer

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## Submitter Information

**Name:** Morris Whitwer

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## General Comment

I urge you to get rid of ridiculous restrictions that divert resources away from legal immigrants that are upholding the law, and support President Trump's immigration reforms!

AR002263

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-5gyx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0615

Comment Submitted by William Vaughn

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## Submitter Information

**Name:** William Vaughn

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## General Comment

Support President Trump's Immigration Reforms! Finish the WALL NOW!!!!

AR002264

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-k4wj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0616

Comment Submitted by Virginia Bond

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## Submitter Information

**Name:** Virginia Bond

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## General Comment

You must support our president in immigration reform!!! Immigration has been completely out of control and this cannot continue to be tolerated!!! Immigration control is for the good of the country and for the good of each and every citizenen!!! Without immigration control we become equivalent to being a "lawless big land of soil".

AR002265



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-nh4o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0617

Comment Submitted by Jane Justice

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## Submitter Information

**Name:** Jane Justice

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## General Comment

Our Immigration laws are prehistoric. Congress well knows while they have refused to secure the border of this Country and institute common sense immigration proposed by Pres. Donald Trump they are undermining the will of the People but worse have fundamentally changed this country forever and ensured a looming economic collapse. Shame on them! Its Treason to be honest with you.

AR002266

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-st5q
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0618

Comment Submitted by Judith Zufi

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## Submitter Information

**Name:** Judith Zufi

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## General Comment

No one should be permitted entry unless they can self support. Our tax money is not to be used for immigrants who are unable to take care of themselves from moment of entry.

AR002267

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d51-p012 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0619

Comment Submitted by Rob Johansen

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## Submitter Information

**Name:** Rob Johansen

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## General Comment

Work with President Trump to end our ridiculous immigration restrictions and secure our safety.

AR002268

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-vow <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0620

Comment Submitted by Kerry Sprague

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## Submitter Information

**Name:** Kerry Sprague

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## General Comment

I am concerned that illegals can come across the boarder and receive favored treatment over US CITIZENS and those trying to come legally. I became a US citizen LEGALLY! Legal immigration is COMMON SENSE! It is fair and protects the citizens of the US. ALL OTHER COUNTRIES HAVE BORDER LAWS AND THEIRS ARE RESPECTED! It's sane to have protected boarders and thereby protected immigration.

Those of you who don't protect the US are putting your own families at risk. Please protect all of us and stop risking criminals, drugs, illegal guns , and illness from making residence in our Homeland. Thank you!

AR002269

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-45sz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0621

Comment Submitted by Donald Cartin

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## Submitter Information

**Name:** Donald Cartin

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## General Comment

Just a note (to whomever it may concern), that I, as a US Citizen and registered voter of the state of Georgia, fully support President Trump in his efforts to improve our country.

AR002270

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5l-vviy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0622

Comment Submitted by Marie Waters

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## Submitter Information

**Name:** Marie Waters

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## General Comment

We need to support President Trumps Immigration Reforms.

AR002271

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-5p8c <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0623

Comment Submitted by Thomas Drummond

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## Submitter Information

**Name:** Thomas Drummond

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## General Comment

To many homeless people to allow in more immigration

AR002272

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-keq7 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0624

Comment Submitted by June Martinez

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## Submitter Information

**Name:** June Martinez

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## General Comment

Support the American People and President Trump and get the reforms in place so that we can get back to being a good place for people to want to come and WORK and earn and support one another.

AR002273



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-efyi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0625

Comment Submitted by Lula Broome

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## Submitter Information

**Name:** Lula Broome

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## General Comment

I would like to strongly voice my opinion for President Trump's Immigration Reform! I am extremely discouraged by the LEFT's side in trying to constantly do anything to hurt this president. Ignoring the work that needs to be done on the immigration reform is doing nothing but hurting our country. The National security if being jeopardized by your ridiculous tactics ONLY because you are so adamantly against President Trump!!! I am sick and tired of the left wasting and spending our tax payer dollars on their shenanigans!! Please get to work for the good of our country and start supporting our President that only is looking out for the good of our country which MUST begin with immigration reform.....even building that WALL!!!!

AR002274

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-9hv0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0626

Comment Submitted by Bill Lesch

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## Submitter Information

**Name:** Bill Lesch

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## General Comment

Enforce President Trumps Immigration reforms to help secure America's safety and protect our finances!

AR002275

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-jpm6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0627

Comment Submitted by Barbara Frank

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## Submitter Information

**Name:** Barbara Frank

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## General Comment

No country can remain a sovereign entity if its borders are open to all especially its sworn enemies. Do the right thing. And your job. Support Trump's immigration reform legislation ASAP.

AR002276

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-l9nt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0628

Comment Submitted by Terry Price

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## Submitter Information

**Name:** Terry Price

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## General Comment

Please help President Trump with Immigration reform !!!

AR002277

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-csn3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0629

Comment Submitted by Madeline Wahl

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## Submitter Information

**Name:** MADELINE WAHL

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## General Comment

Immigration Reform is a MUST if Americans want this country to survive.

AR002278

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-3vyp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0630

Comment Submitted by Teresa Dziadul

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## Submitter Information

**Name:** TERESA DZIADUL

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## General Comment

LISTEN TO THE PRESIDENT!

AR002279

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-btjz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0631

Comment Submitted by Larry Frahm

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## Submitter Information

**Name:** Larry Frahm

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## General Comment

I strongly support President Trumps Immigration Reforms. You folks need to support them as well !

AR002280

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-uupv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0632

Comment Submitted by Gail Merrill

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## Submitter Information

**Name:** Gail Merrill

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## General Comment

For the security of our country, its time to accept the immigration reforms proposed by President Trump.

AR002281



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-owva <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0633

Comment Submitted by John Stowe

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## Submitter Information

**Name:** John stowe

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## General Comment

I fully support President Trumps proposed immigration reforms.

AR002282

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-ude3 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0634

Comment Submitted by Gary Cannon

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## Submitter Information

**Name:** Gary Cannon

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## General Comment

We must stop the immigration crisis at our boader now. I lived in San Diego for 40 years, and saw the tragedy first hand, even having my car stolen by illegal immigration smugglers and recovered by Board Patrol Agents. Please support Trump's immigration reforms now!  
Thank you.

AR002283

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-wapl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0635

Comment Submitted by Roderick Welsh

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## Submitter Information

**Name:** Roderick Welsh

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## General Comment

Please work to revise these ridiculous ineffective asylum regulations that do not work to keep America safe.  
Thank you.

AR002284

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-gihw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0636

Comment Submitted by Kathy Owen

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## Submitter Information

**Name:** Kathy Owen

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## General Comment

Support President Trump's immigration reforms!

AR002285

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-nwai <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0637

Comment Submitted by Phyllis Bove

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## Submitter Information

**Name:** Phyllis Bove

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## General Comment

Please take your responsibility to protect us seriously!!!!

AR002286

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-zuq7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0638

Comment Submitted by L. Conner

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## Submitter Information

**Name:** L. Conner

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## General Comment

We need LEGAL immigrants & having open borders will only be the destruction of what the USA has become over these hundreds of yrs. With all the countries & people w/evil ideas of our demise, it is being INVITED. We NEED to preserve the USA. Congress NEEDS to get to work on proper Immigrant reform NOW!!!

AR002287

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-4m0m <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0639

Comment Submitted by Clyde Drew

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## Submitter Information

**Name:** Clyde Drew

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## General Comment

Let trump do what's best for americans

AR002288

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-8pte <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0640

Comment Submitted by Richard Bennett

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## Submitter Information

**Name:** Richard Bennett

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## General Comment

Washington to Support President Trump's Immigration Reforms!

AR002289



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-jf9l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0641

Comment Submitted by Kristin Gray

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## Submitter Information

**Name:** Kristin Gray

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## General Comment

There is too much fraud and cheating in our elections. Letting illegals vote is cancelling out citizens votes. Could we please start enforcing our laws and make this a safer country for our law-abiding citizens. It's truly disgusting that our elected officials seem to pick and choose which laws to follow and seem only interested in enriching themselves!

AR002290

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-7vuh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0642

Comment Submitted by Joseph Stout

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## Submitter Information

**Name:** Joseph Stout

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## General Comment

I strongly ask for support for intelligent immigration reforms backed by President Trump.

AR002291

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-e6u7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0643

Comment Submitted by Shawn Grammont

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## Submitter Information

**Name:** Shawn Grammont

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## General Comment

As a American citizen I highly urge you to put an end to this absurd witch hunt over nothing and serve the citizenry by supporting and protecting the US Constitution.

AR002292

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-dah2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0644

Comment Submitted by Kathy Burris

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## Submitter Information

**Name:** Kathy Burris

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## General Comment

Stop all illegal immigration! If American citizens must follow our laws then so should others coming in or attempting to do so.

The taxes we pay should be used for and ONLY for legal citizens. There are already avenues for non-citizens to come into this country and all should have to abide by those laws!

AR002293

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-gjn6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0645

Comment Submitted by Erin Plourde-Bragg

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## Submitter Information

**Name:** Erin Plourde-Bragg

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## General Comment

Keep building our wall! Can you arrest the criminals in our government, please? We pray for your safety . God bless you, Mr President. Also, shut down the abortion god. Our future is being slaughtered.

AR002294

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-b4sp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0646

Comment Submitted by Larry Schillinger

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## Submitter Information

**Name:** Larry Schillinger

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## General Comment

Why the Left is supporting a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline is beyond me.  
This has to change and it must change NOW!

AR002295

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-fskt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0647

Comment Submitted by Bonnie Thompson

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## Submitter Information

**Name:** Bonnie Thompson

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## General Comment

Back the immigration reforms that our President Trump is standing for

AR002296

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5e-ddre <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0648

Comment Submitted by James Eddy

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## Submitter Information

**Name:** James Eddy

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## General Comment

support President trumps imm,igration reform:

AR002297



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-489e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0649

Comment Submitted by Steven brown

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## Submitter Information

**Name:** Steven brown

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## General Comment

Help Trump fix our immigration system please

AR002298

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-4bjj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0650

Comment Submitted by Gwen Hyde

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## Submitter Information

**Name:** Gwen Hyde

---

## General Comment

Reforms are needed,help the President do what is right in this situation...he wants to ,will you let him?? Thank you

AR002299

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-ocu2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0651

Comment Submitted by Douglas Muth

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## Submitter Information

**Name:** Douglas Muth

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## General Comment

Without proper immigration reforms being made we will remain vulnerable to many very bad effects such as terrorists, illegal drugs, gang members, and illegal persons impacting our way of life, our economy, and our safety.

AR002300

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-ejd1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0652

Comment Submitted by Caroline George

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## Submitter Information

**Name:** Caroline George

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## General Comment

It is your sworn duty to support President Trump's immigration reforms.

AR002301

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-uify
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0653

Comment Submitted by Anthony LaRosa

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## Submitter Information

**Name:** Anthony LaRosa

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## General Comment

Please support President Trump's immigration reforms. For far to long illegal immmlgrants have taken advantage of America and americans. My great grand parents learned how to read, write and speak english before they boarded the boat in Italy and came to America in the late 1800's and became american citizens. They worked hard and made something of themselves. Thats the way it should be.

AR002302

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5l-2idj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0654

Comment Submitted by Judith Judd

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## Submitter Information

**Name:** Judith Judd

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## General Comment

Lets get this country going again. Support President Trump's Immigration Reforms. Its time to stamp up for the American's already residing and working in our country.

AR002303

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-skew <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0655

Comment Submitted by Danise Haskins

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## Submitter Information

**Name:** Danise Haskins

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## General Comment

Congress needs to support President Trumps immigration policies Now! The American people need to be protected and these immigrants need to follow the laws, like everyone else!!

AR002304

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-vdgp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0656

Comment Submitted by Joan Stephenson

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## Submitter Information

**Name:** joan stephenson

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## General Comment

I hope that you will support President Trump's Immigration Reforms!

AR002305



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-f729
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0657

Comment Submitted by Barbara Egan

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## Submitter Information

**Name:** Barbara egan

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## General Comment

Please do your job and support President TRumps Immigrant Reform

AR002306

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-e5tg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0658

Comment Submitted by Laurie Fajardo

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## Submitter Information

**Name:** Laurie Fajardo

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## General Comment

I oppose the timeline restriction that you have placed on the immigration asylum seekers screening process. In the safety of the American People this will jeopardize our security. Think of us, the American People, instead of your own agenda and use common sense. We expect this!

AR002307

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-k308
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0659

Comment Submitted by Kevin Then

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## Submitter Information

**Name:** Kevin Then

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## General Comment

Please eliminate the allure of illegal immigration by supporting mandatory E-Verify across the board and supporting President Trump's reforms.

AR002308

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-ro9j
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0660

Comment Submitted by Ruth Petersen

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## Submitter Information

**Name:** Ruth Petersen

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## General Comment

Please support President Trumps recommendations on Border Issues. Please remove the 30 day rule.

AR002309

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-73rt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0661

Comment Submitted by Scott Farrar

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## Submitter Information

**Name:** Scott Farrar

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## General Comment

I am sending this email to tell you to start doing your job before we replace you . The immigration crisis at the Mexico border must be paid it's just attention. 30 days to determine a person's ID is ludicrous. Common sense strategies are crucial. Protect the US citizens or suffer the wrath of a wakening people who WILL hold you responsible and vote accordingly. GOD Bless The United States of America, and God help you. You took an oath to the Constitution, you had best start doing it!!!

AR002310

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-nguo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0662

Comment Submitted by Jon Brittain

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## Submitter Information

**Name:** Jon Brittain

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## General Comment

Please do all that you can to support President Trumps immigration reforms and make them happen. Too much time is being wasted doing nothing and this is a shame.

AR002311

# PUBLIC SUBMISSION

**As of:** September 15, 2020  
**Received:** November 06, 2019  
**Status:** Posted  
**Posted:** November 06, 2019  
**Tracking No.** 1k3-9d5i-wg2q  
**Comments Due:** November 08, 2019  
**Submission Type:** Web

**Docket:** USCIS-2018-0001

## Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

## Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0663

Comment Submitted by Leon Desourdy

## Submitter Information

**Name:** Leon Desourdy

## General Comment

SUPPORT PRESIDENT TRUMPS IMMIGRANTION REFORM NOW!!!!

AR002312

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-99xi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0664

Comment Submitted by Dennis Lewis

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## Submitter Information

**Name:** Dennis Lewis

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## General Comment

We need the President's Immigration Policies!

AR002313



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-9vgw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0665

Comment Submitted by John Corvia

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## Submitter Information

**Name:** John Corvia

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## General Comment

God Willing please support President Trump's immigration reforms.

AR002314

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-i2fi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0666

Comment Submitted by Daniel Moore

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## Submitter Information

**Name:** Daniel Moore

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## General Comment

Tired of Illegals sucking this Country dry...Way past time to put a stop to it

AR002315

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-4794
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0667

Comment Submitted by Donald Schoeb

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## Submitter Information

**Name:** DONALD SCHOEB

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## General Comment

Please pass President Trumps immigration reforms. A nation without immigration laws or borders is no longer a nation.

AR002316

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-qxpl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0668

Comment Submitted by Michael Sommer

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## Submitter Information

**Name:** Michael Sommer

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## General Comment

Given the inundation of immigrants, and the many who are seeking asylum, reform of our immigration system is necessary to give adequate time to vet those seeking asylum, and resolve the issue of illegal immigrants entering the United States and being given various forms of assistance that many Americans have worked for but do not receive so readily. It is our responsibility and, if you will, our moral obligation to take care of our families first those who are legal American citizens.

AR002317

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-boyrr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0669

Comment Submitted by Vyrna Long

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## Submitter Information

**Name:** Vyrna Long

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## General Comment

Please support President Trump on his immigration reform. Let him do his job. Thats why we hired him. Thank You.

AR002318

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-knqj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0670

Comment Submitted by KENT FOSSUM

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## Submitter Information

**Name:** KENT FOSSUM

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## General Comment

Please support POTUS's immigration reforms. It is time to take action so the 116th congress can accomplish something for the American people before the end of the term.

AR002319

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-q8ad
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0671

Comment Submitted by John Mayhew

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## Submitter Information

**Name:** JOHN MAYHEW

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## General Comment

Please support all of Trumps immigration reforms. The current set of laws and regulations is hurting the United States. Put your big boy pants on and join the generation reclaiming THE UNITED STATES OF AMERICA. Or rot on the viine.

AR002320

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-wrya
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0672

Comment Submitted by Bob Fechter

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## Submitter Information

**Name:** Bob Fechter

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## General Comment

We need to support Pres. Trump in his efforts to deal with so many immigrants seeking legal status in our Nation. The arbitrary time limits placed on his administration make it impossible to deal fairly with everyone.

AR002321



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5e-t3lw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0673

Comment Submitted by Karen Tima

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## Submitter Information

**Name:** Karen Tima

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## General Comment

Every immigrant needs to be completely vetted before they are allowed in our country....NO SHORTCUTS!!!

AR002322

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-6z63
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0674

Comment Submitted by Theresa Van Nice

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## Submitter Information

**Name:** Theresa Van Nice

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## General Comment

I support and honor President Trumps immigration reform, and so should you. Please! Thank you

AR002323

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-f0k3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0675

Comment Submitted by Susan Jones

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## Submitter Information

**Name:** Susan Jones

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## General Comment

Please listen to Americans and support Trumps Immigration Reforms!!! Trump is working for us and so are you, but Trump is doing his job and House & Senate not.

AR002324

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5l-p8z9 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
---

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0676

Comment Submitted by Lloyd Vogt

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## Submitter Information

**Name:** Lloyd vogt

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## General Comment

Please honor our President Trump immigration

AR002325

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-9sqv <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0677

Comment Submitted by Philip Duncan

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## Submitter Information

**Name:** Philip Duncan

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## General Comment

SUPPORTS TRUMPS IMIGRATION REFORM. GIVE US BACK AMERICA

AR002326

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-xly5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0678

Comment Submitted by Leslie Herbert

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## Submitter Information

**Name:** Leslie Herbert

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## General Comment

Our immigration system needs more than 30 days to properly vet asylum seekers. It is vital to our security to extend the time so this process can be done properly .

AR002327

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-50wq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0679

Comment Submitted by leon Beckworth

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## Submitter Information

**Name:** leon Beckworth

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## General Comment

Stop this wave after wave of sometimes violent immigrants and make them go through legal entry

AR002328

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-u4xp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0680

Comment Submitted by Tecla Long

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## Submitter Information

**Name:** Tecla Long

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## General Comment

we need for you to support President Trump's immigration reforms!

AR002329



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-nefb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0681

Comment Submitted by Eric Hanson

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## Submitter Information

**Name:** Eric Hanson

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## General Comment

Please support the immigration reforms President Trump is trying to implement. Our national security is at stake and you are one of those responsible for making pur nation safe. Your diligent effort and support is much appreciated.

AR002330

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5l-hfhn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0682

Comment Submitted by Arthur Posluszny

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## Submitter Information

**Name:** Arthur Posluszny

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## General Comment

I write to urge that you take prompt action to support President Trump's proposed immigration reforms!

AR002331

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-6o4j <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0683

Comment Submitted by Cynthia Glennie

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## Submitter Information

**Name:** Cynthia Glennie

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## General Comment

We need reforms to our immigration laws. Please vote for President Trumps immigration reform

AR002332

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-zsy1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0684

Comment Submitted by Richard Whiffen

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## Submitter Information

**Name:** Richard Whiffen

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## General Comment

Support Donald Trump's Immigration Reforms

AR002333

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-s4lt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0685

Comment Submitted by Dennis Mcevoy

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## Submitter Information

**Name:** Dennis Mcevoy

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## General Comment

Please write your comment here. please support Pres Trump's immigration reforms. He is trying to help America and keep it safe. Thank you.

AR002334

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-2hyz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0686

Comment Submitted by Donna Decristofaro

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## Submitter Information

**Name:** Donna Decristofaro

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## General Comment

We need immigration reform now. We don't need more terrorists in this country. Please work with the President.

AR002335

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-gq52
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0687

Comment Submitted by Ernest Lottman

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## Submitter Information

**Name:** Ernest Lottman

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## General Comment

It is incomprehensible that a 'law' would require a background check be -completed- within 30 days on every asylum applicant. INS took almost 7 -years- to process my legal, green-card-holding naturalized citizen wife! Why would asylum seekers benefit from a radically-expedited process over legal applicants? And why would any law stipulate a quick deadline for processing...with no recognition of the overwhelming unprecedented number of asylum-seekers coming through, and no promise of financial or manpower resources to fulfill the law, since our national security and open borders have been made into a political football?!

This is totally wrong. Please revise the deadline to take explicit account of (1) the number of current asylum seekers, and (2) the financial and manpower resources that have (or have not) been made available by Congress to handle this screening.

Your heroic attempt to execute the law and protect America, while seeking to accommodate the incompetent foot-dragging immigration neglect by Congress, is deeply appreciated.

AR002336

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-2x58 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0688

Comment Submitted by Sharlee Bong

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## Submitter Information

**Name:** Sharlee Bong

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## General Comment

Progress needs to be made

AR002337



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5j-3k2a <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0689

Comment Submitted by Kenneth Freund

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## Submitter Information

**Name:** kenneth freund

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## General Comment

must be controlled and verified per each person

AR002338

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-3df6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0690

Comment Submitted by Mike Lawson

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## Submitter Information

**Name:** Mike Lawson

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## General Comment

I insist as a US citizen you support The Presidents immigration policies. They protect and serve we the people. The insane policies of the socialist agenda have to stop.

AR002339

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-yvbn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0691

Comment Submitted by Barbara Egan

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## Submitter Information

**Name:** Barbara egan

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## General Comment

You are suppose to be representing the people. Do your job and support President Trump's immigration reforms.

AR002340

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-isfy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0692

Comment Submitted by Barry Williams

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## Submitter Information

**Name:** Barry Williams

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## General Comment

I ask you to support President Trump's Immigration Reform changes; I believe these changes are warranted and needed !!!

AR002341

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-hzlp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0693

Comment Submitted by Carol Delise

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## Submitter Information

**Name:** Carol Delise

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## General Comment

President Trump has taken a much needed stand against illegal immigration. Please stand with our President and support his Immigration Reforms.

AR002342

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-dgi3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0694

Comment Submitted by Barbara McKay

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## Submitter Information

**Name:** Barbara McKay

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## General Comment

SupportPresident Trumps Immigration Reforms.

AR002343

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-7xp2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0695

Comment Submitted by Melissa Popeck

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## Submitter Information

**Name:** Melissa Popeck

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## General Comment

As your constituent I am requesting you vote in favor of President Trumps immigration reforms. I strongly support President Trump and his agendas. Please support him as well.

AR002344

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-wyye <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0696

Comment Submitted by Coby Thompson

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## Submitter Information

**Name:** Coby Thompson

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## General Comment

Support president Trump on this border issue.

AR002345



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-1stf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0697

Comment Submitted by James Dillon

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## Submitter Information

**Name:** James Dillon

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## General Comment

I support Pres.Trump!

AR002346

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-2n31
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0698

Comment Submitted by Barbara Egan

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## Submitter Information

**Name:** Barbara egan

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## General Comment

You are getting paid to do a job so support President Trumps Immigrant Reform.

AR002347

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-8qmd <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0699

Comment Submitted by Harriet Bradley

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## Submitter Information

**Name:** Harriet Bradley

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## General Comment

Lindsey Graham

Jeff Duncan

Tim Scott

Support President Trump on immigrant laws. Destroy the left side.

AR002348

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-jgj7 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0700

Comment Submitted by Vicki Huntoon

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## Submitter Information

**Name:** Vicki Huntoon

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## General Comment

We all need to support President Trump's immigration reform!

AR002349

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-6x55
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0701

Comment Submitted by Kathryn Kindle

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## Submitter Information

**Name:** Kathryn Kindle

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## General Comment

I am with President Trump on his views that those immigrants who play by the rules to obtain US citizenship should received our best effort to make sure they can. Taking away resources and placing them in the hands of illegal immigrants is just plain not right. Nor is it the best use of our resources, citizens' taxes and to our safety and for everyone's welfare.

Why would you give it to some one who is not veted, who may have a criminal record and who has broken our laws about entering our country. Not only that, they may be using resources and get a job that they are not, or should not have, rather that that which is entitled to a US citizen.

I implore you to look at and hopefully approve the Immigration Reforms that are being proposed.

We can make the United States of America better place if we do the right thing and ensure that legal immigrants get treated right before the illegal immigrants.

Thank you for your time and best consideration on this matter,

AR002350

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-rza7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0702

Comment Submitted by Dennis Bertulli

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## Submitter Information

**Name:** DENNIS BERTULLI

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## General Comment

Please support President Trump's Immigration Reforms. Continue to build the wall and improve the security on our borders.

AR002351

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-1lgz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0703

Comment Submitted by Catherine Greenwalt

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## Submitter Information

**Name:** Catherine Greenwalt

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## General Comment

Be American and stand with President Trump

AR002352

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-1yh1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0704

Comment Submitted by Colleen Lawson

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## Submitter Information

**Name:** Colleen Lawson

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## General Comment

Stop fighting immigration reform. Fight terrorism, socialism, and work with president trump to make America free again. Break the deal with the devil, that crooked politicians made.

AR002353



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-2qzj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0705

Comment Submitted by Victoria Buzzell

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## Submitter Information

**Name:** Victoria buzzell

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## General Comment

Its time to support our president immigration reform. Start showing the Angel moms that their family members mean more to you than a vote from an illegal.

AR002354

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-pfjh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0706

Comment Submitted by Lori Metcalf

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## Submitter Information

**Name:** Lori Metcalf

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## General Comment

American citizens are the ones that need the help. The homeless, the drug addicts, the starving children, the sick veterans that fought for the freedom of our country! These are the people you need to focus on.

Illegal Immigrants must come into this country legally and submit their paperwork and wait their turn like all other immigrants that have done in the past . The ones that adhered to the laws, rules and regulations. These are the ones that must be given the chance FIRST!

I support President Trump and Ken Cuccinelli in securing our border at all cost. Americas Safety FIRST!

AR002355

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-jiaz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0707

Comment Submitted by Bonnie Dove

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## Submitter Information

**Name:** Bonnie Dove

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## General Comment

Stop the 30 day insanity. It is impossible to properly implement. Legal immigrants should take preference.

AR002356

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-p5kz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0708

Comment Submitted by Kathy Taylor

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## Submitter Information

**Name:** Kathy Taylor

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## General Comment

Support immigration reform!!!!

AR002357

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-h49d
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0709

Comment Submitted by Mary Pumphrey

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## Submitter Information

**Name:** Mary Pumphrey

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## General Comment

For the good of the country support Pres Trump's immigration reforms. Hate cannot wins this country's hearts and minds

AR002358

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-7519
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0710

Comment Submitted by Robert Bartlett

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## Submitter Information

**Name:** Robert Bartlett

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## General Comment

This has to Stop ! Our laws were Just fine before . If you have good values and enter our country legally our arms are open .

AR002359

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-kkix <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0711

Comment Submitted by Tim Kelly

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## Submitter Information

**Name:** Tim Kelly

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## General Comment

Please support President Trump's immigration reform. Build the wall. Process legal immigrants first.

AR002360

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5l-m2r4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0712

Comment Submitted by Leila Glidden

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## Submitter Information

**Name:** Leila Glidden

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## General Comment

Get off you duff and support our President. We have not had a president this good since Reagen.

AR002361



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-eilz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0713

Comment Submitted by Robert Peel

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## Submitter Information

**Name:** Robert Peel

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## General Comment

I am contacting you to urge you to support President Trump's immigration reforms.

AR002362

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-e559
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0714

Comment Submitted by Renee Bothwell

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## Submitter Information

**Name:** Renee Bothwell

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## General Comment

There is no way to process so many people in 30 days and do an efficient job. Our government needs more time to do a thorough background check to keep America safe. Lets give our President more time. We dont know anything about the illegals coming here. How can they be processed in thirty days when it takes that long to do a background check on our own citizens applying to purchase a firearm. Our citizens who have a Social Security card and sometimes fingerprints or DNA on file. Think about that.

AR002363

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-af11
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0715

Comment Submitted by Pat Ward

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## Submitter Information

**Name:** Pat Ward

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## General Comment

Our immigration laws need to be changed to ensure our country's security. Please support President Trump's reforms.

AR002364

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-j3nh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0716

Comment Submitted by Pamela Stout

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## Submitter Information

**Name:** Pamela Stout

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## General Comment

As a Naturalized Citizen, I implore you to put President Trump's Immigration Reforms in place. People who break our laws and enter the country illegally should not be granted legal status.

AR002365

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5l-eo3g <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0717

Comment Submitted by Barbro Karlsson-Bradley

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## Submitter Information

**Name:** Barbro Karlsson-Bradley

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## General Comment

I support President Trump 100%.

NO MORE ILLEGAL IMMIGRATION!

I am for legal immigration. We need them. But background checks is important.

I welcome legal immigration with open arms.. I am a legal immigrant.

worked and payed taxes from day

one.

I support President Trump 100 %.

AR002366

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-21tf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0718

Comment Submitted by Demetrios Vagalatos

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## Submitter Information

**Name:** Demetrios Vagalatos

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## General Comment

We need to control our borders and allow people who will work for the greatness of this country instead of trying to destroy it. We do NOT need multiculturalism. The only way to survive is to be one America.

AR002367

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-qzir
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0719

Comment Submitted by Thomas Waters

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## Submitter Information

**Name:** Thomas Waters

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## General Comment

We have had enough of illegal immigration. My grandmother came here in 1928 at 17 years old. She never got a chance to go back to Ireland to visit, or send money over there, or take any vacations, or own a car or a home. She was too busy working, paying taxes and raising two young children as a widow. Its a disgrace and an insult to her life that she did everything legally and never took a handout. Yet now all you have to do is sneak in and have everything handed to you. We the American people are fed up. You liberals are delusional and make me sick.

AR002368

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-koam
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0720

Comment Submitted by Stephen Guffanti

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## Submitter Information

**Name:** Stephen Guffanti

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## General Comment

There are 7 billion people in this world. They can't all live here. We need immigration laws that control who lives here and who doesn't. If you persist with a 30 day limitation then also add automatic denial if background check isn't available at that time. If that doesn't work for you extend the the limitation.

AR002369



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-c9u1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0721

Comment Submitted by Keith Ferrin

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## Submitter Information

**Name:** Keith Ferrin

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## General Comment

I am concerned about the immigration issues of our country. Please support President Trump in his immigration reforms because I do.

AR002370

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5e-3aty <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0722

Comment Submitted by Anne Obeck

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## Submitter Information

**Name:** Anne Obeck

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## General Comment

I support President Donald Trumps new immigration policies for the good of are Country. We have been glutted by illegal people taking our resources without due process which is a direct assault on the welfare of our communitys and legal Americans. You are not doing the job we voted you to do unless you start protecting us from this onslaught . My vote still counts and my voice will be heard.

AR002371

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-gfkf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0723

Comment Submitted by Judy Owen

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## Submitter Information

**Name:** JUDY OWEN

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## General Comment

we american citizens demand you support President Trumps immigration reforms. also build the wall and put a stop to this insane impeachment act.

AR002372

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-8o58
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0724

Comment Submitted by Carol Davis

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## Submitter Information

**Name:** Carol Davis

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## General Comment

The United States Customs and Immigration Services (USCIS) is seeking to reform its asylum processing rules to be able to better screen incoming applicants. This reform is necessary to insure national security, proper vetting of asylum applicants, and proper allocation of resources. I strongly support these reforms.

AR002373

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-5uy9 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0725

Comment Submitted by Rick Pratt

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## Submitter Information

**Name:** Rick Pratt

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## General Comment

We need immigration reform now! Please support the presidents plan.

AR002374

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-es9i
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0726

Comment Submitted by Randy Fountain

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## Submitter Information

**Name:** Randy Fountain

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## General Comment

Dear Congress

Do your job for this country, and support President Trumps immigration reforms!

AR002375

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-svy6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0727

Comment Submitted by Andrea Wargo

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## Submitter Information

**Name:** Andrea Wargo

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## General Comment

We red blooded American support President Trump's Immigration Reforms. Watch what happened to Europe with unfettered immigration. Chaos and Crime!

AR002376

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-d21c
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0728

Comment Submitted by Gail Daley

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## Submitter Information

**Name:** Gail Daley

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## General Comment

Please stop jeopardizing our national security by blocking President Trumps immigration reforms. Based on the number of illegals coming into our country a 30 day policy for adjudication is not feasible or realistic.

PLEASE SUPPORT President Trumps Immigration Reforms.

AR002377



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-x511
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0729

Comment Submitted by James Kemp

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## Submitter Information

**Name:** James Kemp

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## General Comment

I want you to support President Trump's  
Immigration Reforms!

AR002378

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-gktg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0730

Comment Submitted by Charles Dunitz

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## Submitter Information

**Name:** Charles Dunitz

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## General Comment

Join President Trump in protecting all USA citizens from illegal aliens and stop wasting tax payers money on illegal aliens.

AR002379

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5l-vqmr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0731

Comment Submitted by Shira Levine

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## Submitter Information

**Name:** Shira Levine

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## General Comment

I urge you to support immigration reform. Including tightening our southern border.

AR002380

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-g68a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0732

Comment Submitted by Kathleen Oles

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## Submitter Information

**Name:** Kathleen Oles

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## General Comment

30 days is not nearly enough time to screen and vet those who are coming into our country under claims of asylum. This Must be changed!

AR002381

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-hyu1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0733

Comment Submitted by Ann Mihalek

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## Submitter Information

**Name:** Ann Mihalek

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## General Comment

Support Trump Immigration Reforms!

AR002382

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-c3qk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0734

Comment Submitted by Joyce Friedericy

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## Submitter Information

**Name:** joyce friedericy

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## General Comment

you need to support our great president's immigration reforms

AR002383

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-ub9b
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0735

Comment Submitted by Roy Olsen

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## Submitter Information

**Name:** Roy Olsen

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## General Comment

Please keep illegals out of the US, build the wall, no free health, no social security, no sanctuary cities, no birth right babies, Americans first!

AR002384

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-uxyx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0736

Comment Submitted by Alexis Clarke

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## Submitter Information

**Name:** Alexis Clarke

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## General Comment

Immigration reform. Support our President.

AR002385



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-qphz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0737

Comment Submitted by Kent Barnett

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## Submitter Information

**Name:** Kent Barnett

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## General Comment

It is time to start supporting the people who pay your salary, and start making America a safe place for her CITIZENS! Our ancestors came here legally, loved this nation and her freedoms, supported her Constitution, and fought her wars! Please!!!! Do your job, and stop FIGHTING our President!

AR002386

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-sr0n
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0738

Comment Submitted by Diana Fridline

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## Submitter Information

**Name:** Diana Fridline

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## General Comment

I'm strongly asking you to support President Trump's Immigration Reforms! This is very important to the safety of our country!

AR002387

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-i92c
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0739

Comment Submitted by Mary Myers

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## Submitter Information

**Name:** Mary Myers

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## General Comment

Keep America safe. Stop taking shortcuts with immigration. People must be vetted appropriately. Americans first. We can be a greater country with strong borders and smart policies which allow others in with assistance to become independent citizens of the USA

AR002388

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-2c7e <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0740

Comment Submitted by Eugene Mahoney

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## Submitter Information

**Name:** Eugene Mahoney

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## General Comment

You must stop the illegal impeachment process with which you are doing. President Trump has done nothing wrong, you wanting the impeachment due to him, President Trump, being a Republican. You are just like Hillery Clinton refusing to beleive you lost the election in 2016...GET READY FOR 2020...Trump will win!!!

AR002389

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-kq0u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0741

Comment Submitted by Kathryn Carter

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## Submitter Information

**Name:** Kathryn Carter

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## General Comment

You are supposed to represent American citizens and legal immigrants, not those who try to come here illegally. Support President Trump's immigration reforms.

AR002390

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-fcy9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0742

Comment Submitted by Lona Thompson

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## Submitter Information

**Name:** Lona Thompson

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## General Comment

Please support President Trump in his efforts to help the American People. He is trying to protect us and make our lives better. Stop the Democrats from destroying our great country. Bring those who are breaking the law and those who have broken the law to justice now before it is too late.

AR002391

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5l-scy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0743

Comment Submitted by Shirley Sweeney

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## Submitter Information

**Name:** Shirley Sweeney

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## General Comment

Support President Trump and his Immigration Reforms!  
That would be supporting our founding Constitution

AR002392

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5l-whh8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0744

Comment Submitted by Teresa Generas

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## Submitter Information

**Name:** teresa generas

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## General Comment

PThese people need to be properly checked out before entering our Country. Support President Trump in his efforts to do so.

AR002393



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-yzcd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0745

Comment Submitted by Janell Chaney

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## Submitter Information

**Name:** Janell Chaney

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## General Comment

Please support the immigration reforms set in place by our President. It will cost less money and secure the nation better.

AR002394

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-j5zq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0746

Comment Submitted by Carol Copeland

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## Submitter Information

**Name:** Carol Copeland

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## General Comment

Build the wall and stop illegals from being in our country!

AR002395

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-6xu7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0747

Comment Submitted by Melva Worley

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## Submitter Information

**Name:** Melva Worley

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## General Comment

We need to secure borders, please support the President.

AR002396

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-u9y4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0748

Comment Submitted by Linda Jones

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## Submitter Information

**Name:** Linda Jones

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## General Comment

I urge you to support President Trumps immigration reforms. You must help him stop this invasion of America.

Sincerely.  
Linda Jones

AR002397

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-ywqf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0749

Comment Submitted by Michael Babb

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## Submitter Information

**Name:** Michael Babb

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## General Comment

Please SUPPORT President Trump's Immigration Reforms. We must change the way immigration is handle in the united States. this craziness has gone on way too long. Our borders MUST be secured and the rules must change on immigration. Our citizens, such as myself cannot be taxed to death to support illegal immigrants.

I shall be watching how each official votes or no votes and voice this information to your other constituents such as my family and friends and continue writing "letters to the editor" in our local newspapers.

I am counting on your support for President Trump's immigration reforms.

AR002398

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-3b8p <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0750

Comment Submitted by Roy Kaiser

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## Submitter Information

**Name:** Roy Kaiser

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## General Comment

I support strick immigration laws.

AR002399

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-mwia <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0751

Comment Submitted by Germaine Peters

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## Submitter Information

**Name:** Germaine Peters

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## General Comment

Please clean up and support our President's immigration reforms. We need to work on our border problems and make people apply legally to come to this country.

AR002400

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-d4am <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0752

Comment Submitted by William Watts

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## Submitter Information

**Name:** William Watts

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## General Comment

Help keep the thirty day waiting while checking out illegals.

AR002401



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5c-vun6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0753

Comment Submitted by Sue Butcher

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## Submitter Information

**Name:** Sue Butcher

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## General Comment

Please support Immigration Reforms. We need to take care of our security and protect our Country's Sovereignty.

AR002402

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-jxii
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0754

Comment Submitted by Julio Pocon

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## Submitter Information

**Name:** Julio pocon

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## General Comment

The immigration reform that Mr. President and his administration is offering is a great one and most needed for our nation.

Please support it and stop wasting our taxes on impeachment Hoax!

AR002403

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-4lsc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0755

Comment Submitted by Danny Rodgers

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## Submitter Information

**Name:** Danny Rodgers

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## General Comment

I know you are very busy so I will make this short. Support President Trumps immigration reforms!!

AR002404

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5l-83ne <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0756

Comment Submitted by Carol Carlisle

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## Submitter Information

**Name:** Carol Carlisle

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## General Comment

Don't you look at how open borders is effecting countries in Europe and realize it is not a good idea? Those of you who came here legally should not want open borders. Take care of our citizens first.  
Build the wall and follow the laws on the books.

AR002405

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-u14o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0757

Comment Submitted by Miriam Neff

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## Submitter Information

**Name:** Miriam Neff

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## General Comment

Im asking you to help President Trump and Ken Cuccinelli remove the ridiculous restrictions and secure Americas safety by supporting President Trump'simmigration reforms now.

AR002406

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-42wk <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0758

Comment Submitted by Janet Shaw

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## Submitter Information

**Name:** Janet Shaw

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## General Comment

Please support President Trump's Immigration Reforms. Asylum seekers need to be properly vetted, no matter how long it takes. Immigration policies need to benefit US citizens as well as the immigrants

AR002407

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5c-x7ct <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0759

Comment Submitted by Clifford Bruber

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## Submitter Information

**Name:** Clifford Bruber

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## General Comment

I am writing you to make sure you understand that immigration is something that people who want a better, more prosperous, freer life and existence, desire, they must do so in a legal manner and be vetted in order to earn the privilege to come to this country, not crossing over our borders illegally.

AR002408

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-xh1x <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0760

Comment Submitted by Don Damico

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## Submitter Information

**Name:** Don Damico

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## General Comment

STAND WITH TRUMP!!!!!!!!!!!!

AR002409



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-thct <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0761

Comment Submitted by Marion Zulty

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## Submitter Information

**Name:** Marion zulty

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## General Comment

Please support our presidents immigration reform !

AR002410

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-uuae <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0762

Comment Submitted by Rosemarie Ryvolt

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## Submitter Information

**Name:** Rosemarie Ryvolt

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## General Comment

We have to stop supporting illegals

AR002411

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-1pz2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0763

Comment Submitted by Bill Webster

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## Submitter Information

**Name:** Bill Webster

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## General Comment

President Trump's immigration reforms must be put in place. Please support him in this effort.

AR002412

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-nh3l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0764

Comment Submitted by Gloria Sandberg

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## Submitter Information

**Name:** Gloria sandberg

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## General Comment

We have a great President let him. Do his job.  
Support his decisions on immigration.

They cannot be entitled to our American benefits. They are breaking our laws in entering illegal!

AR002413

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5l-ip8z <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0765

Comment Submitted by Jan Mancill

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## Submitter Information

**Name:** Jan Mancill

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## General Comment

I want President Trumps immigration policies to be supported.

AR002414

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-vi14
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0766

Comment Submitted by Cj Elliott

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## Submitter Information

**Name:** Cj Elliott

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## General Comment

Change rules to secure our Borders and stop giving Welfare to illegals illegally. Crime is rampant because of loop holes in system. Benefits meant for Americans are being given to illegals illegally. Stop this abuse now!

AR002415

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5k-744p <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> API
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0767

Comment Submitted by William Haeberle

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## Submitter Information

**Name:** William Haeberle

**Address:**

MO,

**Email:** whaeberle17@gmail.com

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## General Comment

See attached file(s)

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## Attachments

PublicComment

AR002416

**Comment in Opposition to USCIS's Proposed Change to 8 CFR Part  
2018  
DHS Docket No. USCIS-2018-0001**

This comment comes from William Haeberle, a current student at the University of Missouri-Columbia School of Law. This comment applies only to USCIS's proposed rule insofar as it relates to the question of rescinding the 30-day processing deadline for Employment Authorization Document (EAD) applications by asylum seekers. I do not intend to express any thoughts on the USCIS's intention to rescind the 90-day deadline for EAD renewals. I am opposed to USCIS's current proposal as it relates to the 30-day deadline for three principal reasons: (1) the cost assessments undertaken by the agency in its proposal are incomplete and inadequate; (2) the logical connection between the agency's expressed national security concerns and its proposed solution is either incomplete or tenuous; (3) the proposed policy change is ideologically inconsistent with other expressed priorities of the current Executive Branch. I believe that USCIS can alleviate some of the aforementioned issues if they adopt some alternative suggestions.

**a. The cost assessments undertaken by the agency are incomplete and inadequate.**

In *Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, the United States Supreme Court recognized that an agency rule could be arbitrary and capricious (and therefore invalid) if, "the agency . . . has entirely failed to consider an important aspect of the problem."<sup>1</sup> Accordingly, the first reason I oppose the new rule is because I believe that the cost estimates contained therein are seriously incomplete and therefore do not adequately provide the agency (or the public) with a serious assessment of the potential costs of the change.

The agency's cost estimate is currently limited primarily to an estimate of the costs the measure would impose on businesses who would be unable to hire asylum seekers whose EADs are delayed by the rule.<sup>2</sup> Even if these estimates are

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<sup>1</sup> *Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983).

<sup>2</sup> See Removal of 30-Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications, 84 Fed. Reg. 47148, 47163 (Sept. 9, 2019).



reasonably accurate, they are far from a complete assessment of the costs that the American public will incur because of the rule. When asylum seekers are denied the ability to earn a lawful income, their costs of living do not simply disappear. Asylum seekers are generally not eligible for public welfare programs (such as SNAP, Medicaid, SSI, etc.) until their asylum applications have been granted.<sup>3</sup> Because of this, charities within the communities of these asylum seekers will be compelled to divert funding away from other sources to help unemployed asylum seekers with emergency day-to-day expenses.

Indeed, USCIS recognizes this reality in its proposition, stating that, “DHS assumes the longer an asylum applicant’s EAD is delayed, the longer the applicant’s support network is providing assistance to the applicant.”<sup>4</sup> Even so, the USCIS does not undertake any attempt to estimate the costs that this rule will impose on American communities in which pending asylum applicants reside. Instead, USCIS appears to pass the burden of research onto the public, saying, “DHS requests comments from the public on any data or sources that demonstrate the amount or level of assistance provided to asylum applicants who have pending EAD applications.”<sup>5</sup>

To this effect, some sources might prove helpful. On July 1st of this year, President Trump signed into law an emergency aid provision passed by both houses of Congress which appropriated \$30,000,000 to the Federal Emergency Management Agency for redistribution to, “jurisdictions or local recipient organizations serving communities that have experienced a significant influx of such aliens.”<sup>6</sup> These funds are intended to reimburse local governments and non-governmental organizations for costs incurred only since January 1st, 2019.<sup>7</sup> Therefore it appears that Congress and the President have recognized that *at least* \$30,000,000 was appropriate compensation for local communities dealing with this issue in the nine-month span from January 1st, 2019, through the end of the fiscal year on September 30th, 2019.<sup>8</sup>

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<sup>3</sup> National Immigration Forum, *Fact Sheet: Immigrants and Public Benefits*, Aug. 21, 2018 <https://immigrationforum.org/article/fact-sheet-immigrants-and-public-benefits/>

<sup>4</sup> 84 Fed. Reg. 47148 at 47165.

<sup>5</sup> *Id.* at 47165.

<sup>6</sup> Emergency Supplemental Appropriations For Humanitarian Assistance And Security At The Southern Border Act, Pub. L. No. 116-26, 133 Stat. 1019 (July 1, 2019). (The “such aliens” referenced in the quote refers to aliens, “released from the custody of the Department of Homeland Security.”)

<sup>7</sup> *Id.*

<sup>8</sup> *See id.*

Additionally, some anecdotal evidence may be of use. Kate Crow, the director of Jewish Family Services (a charity which houses asylum applicants in San Diego), says that JFS's operating budget is between \$350,000 and \$500,000 per month and that such sums are still not enough to house all asylum seekers who need assistance; the organization still regularly turns away some people who are in need of shelter.<sup>9</sup> The JFS budget is mostly funded by religious organizations and a GoFundMe account.<sup>10</sup>

While neither of the examples listed above can be taken as a definitive metric for measuring the costs imposed on local communities by the proposed measure, they both indicate that there is a serious and significant absence in the USCIS's current accounting. Congress apparently thought that at least \$30,000,000 was spent within a nine-month span by local communities providing assistance to migrants who could not support themselves. A single charitable organization in San Diego expends at least \$350,000 of its contributors' money per month providing assistance to migrants who cannot support themselves. At the very least, these facts show that the USCIS has failed to account for a significant externality in its cost estimates.

The USCIS's current estimates are not only hampered by their failure to account for significant externalities. They are also hampered by the structure of the proposed rule itself. DHS assumes that if the proposed rule is adopted, adjudication timelines will revert back to the status that existed immediately before the *Rosario* court order.<sup>11</sup> This apparently means that DHS believes that after the proposed rule is enacted, approximately 78% of EAD applications will be processed within 60 days.<sup>12</sup> However, USCIS does not intend to replace its 30-day processing requirement with a 60-day processing requirement. In fact, it does not attempt to replace the 30-day requirement with *any* processing timeline standards. This, of course, makes any calculation of costs considerably more speculative than it otherwise would be.

There is some substantial reason to doubt that USCIS will, if the 30-day requirement is not replaced with any timeline restriction, return to a pre-*Rosario* status quo. For one, the USCIS recognizes that the trend in recent years has been

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<sup>9</sup> Jose A. Del Real and Manny Fernandez, "As Government Pulls Back, Charities Step In to Help Released Migrants", *The New York Times* (online, Jan. 14, 2019) <https://www.nytimes.com/2019/01/14/us/illegal-immigrants-border-shelters-charities.html>

<sup>10</sup> *Id.*

<sup>11</sup> 84 Fed. Reg. 47148 at 47149.

<sup>12</sup> *Id.* at 47149.

significant year-over-year growth in the number of individuals seeking asylum.<sup>13</sup> This has resulted in an ever-increasing backlog of pending asylum claims and, consequently, an ever-increasing amount of EAD applications.<sup>14</sup> While the USCIS does not give any firm numbers beyond Fiscal Year-2017, it does indicate that the asylum backlog was still increasing as of June 2018.<sup>15</sup> Because the amount of EAD applications for pending asylum applicants is likely to have continued to rise since the *Rosario* order went into effect in July of 2018, it is unlikely that the USCIS will be able to simply revert back to the pre-*Rosario* status quo in the absence of any processing timeline requirements. Even the USCIS's own website seems to indicate that it will have difficulty attaining pre-*Rosario* status quo timelines if the 30-day limit is removed without any replacement.<sup>16</sup>

The cost estimates advanced by the USCIS in its current proposal are clearly inadequate. The USCIS has chosen to calculate them with an assumption that it will return to the pre-*Rosario* status quo even though: (1) there is significant reason to doubt that the agency will be able to do so, and (2) the agency's proposed rule does not impose *any* timeline to ensure that applications are processed according to its assumptions. Even if the agency's current cost estimates weren't incredibly speculative, they would clearly be incomplete because they have not even attempted to account for plainly substantial externalities.

**b. The logical connection between the agency's expressed national security concerns and the proposed solution is either incomplete or tenuous.**

If a notice of proposed rulemaking, “fails to provide an accurate picture of the reasoning that has led the agency to the proposed rule, interested parties will not be able to comment meaningfully upon the agency's proposals.”<sup>17</sup> In its proposition, USCIS claims that it needs to eliminate the 30-day deadline so that it can, “appropriately vet applicants for fraud and national security concerns.”<sup>18</sup>

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<sup>13</sup> *Id.* at 47153.

<sup>14</sup> *Id.* at 47153.

<sup>15</sup> *Id.* at 47161.

<sup>16</sup> See generally *Check Case Processing Times*, USCIS, <https://egov.uscis.gov/processing-times/home> (last visited Nov. 5, 2019).

<sup>17</sup> *Conn. Light & Power Co. v. NRC*, 673 F.2d 525, 530 (D.C. Cir. 1982).

<sup>18</sup> 84 Fed. Reg. 47148 at 47155.

The USCIS asserts that it has been unable to meet the 30-day processing requirement, “in certain cases due to changes in the agency’s vetting procedures and increased background checks.”<sup>19</sup> However, the agency gives no information about the extent of this issue. The rule proposal contains no information about what percentage of EAD applications are affected by these concerns. Accordingly, it is hard for any individual outside of the agency itself to determine whether the agency’s concerns are legitimate. This may be significant because, “[a]n agency commits serious procedural error when it fails to reveal portions of the technical basis for a proposed rule in time to allow for meaningful commentary.”<sup>20</sup>

Admittedly, eliminating the time restriction entirely would definitively result in the complete alleviation of USCIS’s concerns about timely compliance in the aforementioned, “certain cases.” But if USCIS and the Department of Homeland Security are generally concerned with public safety and security, the proposed rule may prove counterproductive. As the proposed rule explains, the EAD approval process already contains myriad fraud and security protections.<sup>21</sup> But if asylum applicants are delayed for significant periods of time in finding lawful employment, they may begin to turn towards illegal activities as a source of income. Numerous studies have found that there is a link between unemployment and crime (particularly property crime).<sup>22</sup> Thus it appears probable that by further delaying asylum applicants’ ability to become lawfully employed the proposed rule would have a negative overall effect on public safety and security.

**c. The proposed policy change is ideologically inconsistent with other expressed priorities of the current Executive Branch.**

On August 14th, 2019, the Department of Homeland Security issued a final rule which stated that from October 15th onward, aliens who seek applications for admission or adjustments of status will have to establish, “that they are not likely

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<sup>19</sup> *Id.* at 57154.

<sup>20</sup> *Conn. Light & Power Co.*, 673 F.2d 525, 530-531 (D.C. Cir. 1982).

<sup>21</sup> 84 Fed. Reg. 47148 at 47154-47155.

<sup>22</sup> Karin Edmark, *Unemployment and Crime: Is There a Connection?*, Vol. 107 No. 2 The Scandinavian Journal of Economics 353, 370 (Jun. 2005); *see also* Steven Raphael and Rudolf Winter-Ebmer, *Identifying the Effect of Unemployment on Crime*, Vol. 44 No. 1 The Journal of Law & Economics 259, 280 (Apr. 2001); Mikko Aaltonen et al, *Social determinants of crime in a welfare state: Do they still matter?*, Vol. 54 No. 2 Acta Sociologica 161, 161 (June 2011).

at any time to become a public charge.”<sup>23</sup> This rule was significant because it changed the Department’s interpretation of 8 U.S.C. § 1182(a)(4)’s “public charge” requirement for immigrant eligibility.<sup>24</sup> The change effectively made it more difficult for low- and middle-income immigrant families to secure lawful permanent residency status.<sup>25</sup> Ken Cuccinelli, who is the Acting Director of USCIS, has stated that the rule helps to further ensure that, “those seeking to come or stay in the United States can support themselves financially and will not rely on public benefits.”<sup>26</sup>

On October 4, 2019, President Donald Trump issued a proclamation entitled, “Presidential Proclamation on the Suspension of Entry of Immigrants Who Will Financially Burden the United States Healthcare System.”<sup>27</sup> The proclamation intends to restrict entry into the United States of visa applicants who will financially burden the United States healthcare system.<sup>28</sup> The purpose of the proclamation is to protect the interests of the American taxpayer and the American healthcare system.<sup>29</sup>

Though neither of the aforementioned measures apply to asylum applicants, they both indicate that the current Administration is significantly concerned with the burdens that immigrants who are not able to provide for themselves will impose on American communities. The concern expressed by these measures, then, is plainly at odds with the USCIS’s proposed departure from its 30-day EAD application processing restriction. As discussed previously, delaying the ability of asylum applicants to obtain lawful employment would likely result in an increased financial burden on the American communities in which those individuals reside.

Admittedly, asylum applicants cannot technically become a “public charge” within the meaning of 8 U.S.C. § 1182(a)(4) because they are generally not

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<sup>23</sup> Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41292 (Aug. 14, 2019).

<sup>24</sup> Public Charge, *National Immigration Law Center*. <https://www.nilc.org/issues/economic-support/pubcharge/>

<sup>25</sup> *Id.*

<sup>26</sup> Laurel Wamsley, Pam Fessler, and Richard Gonzales, “Federal Judges In 3 States Block Trump’s ‘Public Charge’ Rule For Green Cards”, *NPR* (Oct. 11, 2019). <https://www.npr.org/2019/10/11/769376154/n-y-judge-blocks-trump-administrations-public-charge-rule>

<sup>27</sup> “Presidential Proclamation on the Suspension of Entry of Immigrants Who Will Financially Burden the United States Healthcare System”, Proc. 9945, 84 Fed. Reg. 53991 (Oct. 4, 2019).

<sup>28</sup> *Id.* at 53992.

<sup>29</sup> *Id.* at 53991.



eligible to receive federal public benefits.<sup>30</sup> However, this technicality does not eliminate the very real financial costs that unemployed migrants will impose on American communities. It seems clearly inconsistent for the present Administration to assert that some classes of immigrants must demonstrate their ability to financially support themselves while it simultaneously stifles another class of immigrants' ability to obtain lawful employment.

#### **d. Alternative Suggestions**

In its proposed rule, USCIS does not seem to seriously consider the idea of hiring more staff to allow compliance with the 30-day processing requirement. In fact, USCIS says that it has not even attempted to estimate the costs of this option.<sup>31</sup> As justification for its refusal to seriously consider additional staffing, the USCIS simply says that additional staffing, “would not immediately and in all cases shorten adjudication timeframes.”<sup>32</sup> USCIS seems to be indicating, then, that if a solution is not *immediate* and *total*, it is not worth any serious consideration.

The Migration Policy Institute (MPI), a nonpartisan research institution specializing in migration policy, does not share the USCIS's flippancy towards the idea of hiring new staff.<sup>33</sup> In one of its recent reports, MPI explicitly recommends that, “substantial investments must be made in staffing . . . the asylum system overall.”<sup>34</sup> The report lists, “a *timely*, fair asylum system,” as, “today's first-order need.”<sup>35</sup> MPI's report states directly that a staff-increasing approach should be adopted in opposition to any approaches which narrow, “eligibility and access to asylum processing.”<sup>36</sup> I believe that USCIS should more seriously consider the option of hiring additional staff to allow for better compliance with the 30-day requirement.

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<sup>30</sup> National Immigration Forum, *Fact Sheet: Immigrants and Public Benefits*, Aug. 21, 2018 <https://immigrationforum.org/article/fact-sheet-immigrants-and-public-benefits/>

<sup>31</sup> 84 Fed. Reg. 47148, 47149.

<sup>32</sup> *Id.* at 47149.

<sup>33</sup> Randy Capps, et al., “From Control To Crisis: Changing Trends and Policies Reshaping U.S.-Mexico Border Enforcement”, *Immigration Policy Institute* (August 2019). <https://www.migrationpolicy.org/research/changing-trends-policies-reshaping-us-mexico-border-enforcement>

<sup>34</sup> *Id.* at 35.

<sup>35</sup> *Id.* at 35 (emphasis added).

<sup>36</sup> *Id.* at 35.

In lieu of hiring additional staff, I believe that the USCIS should consider substituting its 30-day processing requirement with a longer time-limited processing requirement. This would allow the agency to come up with more reliable and less speculative cost calculations. It would allow asylum seekers and their communities to have more certainty while waiting for their applications to be approved. I believe that USCIS should also consider, in conjunction with a new time limit, changing the required wait time of 150 days for asylum seekers to apply for EADs (i.e. extending the 30-day processing time limit to 60 days and simultaneously allowing applicants to submit their applications after only 120 days of pendency). In this way, USCIS can ensure that it is able to comply with a new time limit while also staying in line with the regulations' initial purposes.<sup>37</sup>

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<sup>37</sup> See *Rosario v. USCIS*, 365 F.Supp.3d 1156, 1161 (W.D. Wash. 2018) (saying that when the Immigration and Naturalization Service initially implemented the 30-day processing requirement, it did so because it believed that 150 days was a period, “beyond which it would not be appropriate to deny work authorization to a person whose claim has not been adjudicated.”)

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-22ha
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0768

Comment Submitted by Dawn Castle

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## Submitter Information

**Name:** Dawn Castle

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## General Comment

This communication is requesting that you support President Trump's Immigration Reforms. The law that gives the administration 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit is an insanely unreasonable timeframe. It puts our national security at terrible risk

This forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are playing by the rules.

AR002425



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-w23k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0769

Comment Submitted by Jean Brem

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## Submitter Information

**Name:** jean brem

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## General Comment

please change the law to allow more time for background checks before allowing immergrents to stay in our country. please send this message to my house of represenatives and my senator

AR002426

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-97vr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0770

Comment Submitted by Janice Farr

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## Submitter Information

**Name:** Janice Farr

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## General Comment

You are working for me not you. Please pass Pres. Trump's immigration reforms now. Thank you for doing your job.

AR002427

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-bakp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0771

Comment Submitted by Mark Sparks

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## Submitter Information

**Name:** Mark Sparks

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## General Comment

Please support President Trumps immigration reform. Our safety and security depends on it.

AR002428

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5c-x8ko <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0772

Comment Submitted by Veletta Autry

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## Submitter Information

**Name:** Veletta Autry

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## General Comment

I feel President Trump's immigration reform needs to br supported by Washington.

AR002429

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0773

Comment Submitted by David Bulger

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## Submitter Information

**Name:** David Bulger

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## General Comment

Please support POTUS immigration reforms. Thank you.

AR002430

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0774

Comment Submitted by Diane Aratani

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## Submitter Information

**Name:** Diane Aratani

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## General Comment

Pres. Trump is doing an awesome job! Stop blocking him ! Impeachment is a joke! And a lie! Trump 20/20

AR002431

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-ysqm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0775

Comment Submitted by Michael Melillo

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## Submitter Information

**Name:** Michael Melillo

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## General Comment

30 days to review asylum request does not give enough time to protect our national security that means Your and my safety Support President Trump Immigration reforms

AR002432

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-p6tg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0776

Comment Submitted by Thayne Wheeler

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## Submitter Information

**Name:** Thayne Wheeler

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## General Comment

Please fix immigration by first adhering to the laws of this nation. Then we can review laws and make adjustments so we know who is coming into this country and that they do so legally.

AR002433



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0777

Comment Submitted by Mollie Dragstrem

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## Submitter Information

**Name:** Mollie Dragstrem

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## General Comment

Please do not punish those coming into our country legally by making things easy for those who are illegal. That is plain stupidity!

AR002434

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-m65e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0778

Comment Submitted by Stephen Fenton

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## Submitter Information

**Name:** Stephen Fenton

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## General Comment

Please save America for America and those who merit entrance into our beloved country. My grandfather came to this country thru Ellis Island at three years old. And I was raised to believe to do my best for God and my country. A lot of immigrants dont believe in either.

AR002435

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-vhq7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0779

Comment Submitted by Teresa Leake

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## Submitter Information

**Name:** Teresa leake

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## General Comment

Thanks again. I know of person who been here for while. I used work with her she came from Mexico. I believe the last I heard she left , I don't know why she here. Unless ten year. It's was when I work at the laundry cleaning.

AR002436

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-dd6k
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0780

Comment Submitted by Anita Parish

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## Submitter Information

**Name:** Anita parish

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## General Comment

I love our PRESIDENT JUST LIKE HE IS THE ONLY PRESIDENT IN HISTORY THAT KNEW WHAT USA NEEDS, BEST PRESIDENT SENSE REAGAN BUT I THINK BETTER IF HED NOT ELECTED THIS COUNTRY WILL BE NOTHING , THIS COUNTRY WILL DIE

AR002437

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-1ntp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0781

Comment Submitted by Butch Peddie

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## Submitter Information

**Name:** Butch Peddie

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## General Comment

Support Trumps immigration policies.

AR002438

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-elx1
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0782

Comment Submitted by Ivars Loce

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## Submitter Information

**Name:** Ivars Loce

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## General Comment

SUPPORT PRESIDENT DONALD TRUMP'S REFORMATION PLAN IN CHANGING THE ANTIQUATED IMMIGRATION RULES THAT DO NOT PROTECT THE CITIZENS OF THE UNITED STATES!

AR002439

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-rhg8 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0783

Comment Submitted by Steven Bennett

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## Submitter Information

**Name:** Steven bennett

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## General Comment

I for one support what the Trump administration is doing at our borders. illegal aliens need to need to be treated as such they need to be screened and sent back and paperwork filed.. to do it the correct way the legal way they want to become citizens they can come through the Port of entry!!! illegal aliens seeking asylum is illegal despite what others say!!!

AR002440

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-c5tl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0784

Comment Submitted by Judy Hickey

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## Submitter Information

**Name:** Judy Hickey

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## General Comment

Due diligence is necessary before allowing anyone into this country. Support President Trump's immigration reforms. It is time to take a stand for this country. Do not cut corners in the due process of vetting those who want to come into the country.

AR002441



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d51-b5x6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0785

Comment Submitted by Sandra Ewen

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## Submitter Information

**Name:** SANDRA EWEN

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## General Comment

The length of time to review illegals has become a Problem for Immigration. Obama set in place judges to stall the time drastically flooding America with undocumented immigrants. President Trump is trying to bring the Immigration system to a place where all delays can be stopped. I support him in all he does to stop our country from being over run with illegals.

AR002442

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-rwq4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0786

Comment Submitted by Noemy Armstrong

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## Submitter Information

**Name:** Noemy Armstrong

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## General Comment

I am an immigrant and personally do not benefit from the preset chaos in the immigration system. The left wants it, but we the ones that understand what is really happening, do not want chaos. We want order and the rule of law.

I am tired of paying for illegals in the country.

AR002443

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-8dts
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0787

Comment Submitted by N. Shows

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## Submitter Information

**Name:** N. Shows

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## General Comment

With the Democrats refusing to address the immigration problem, it is not feasible that the law only allows 30 days to vet those who want to come to America. Please support President Trump's Immigration Reforms.

AR002444

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5l-cc6g
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0788

Comment Submitted by Carmen Moliere

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## Submitter Information

**Name:** Carmen Moliere

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## General Comment

I support President Trump in Immigration Reform. Many years on hiding under the "rug" this problem that affects We the people who worked here for decades. Is enough.

AR002445

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-hytm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0789

Comment Submitted by Terry Moseng

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## Submitter Information

**Name:** Terry Moseng

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## General Comment

I urge you to support President Trump's Immigration Reforms to keep America secure, fair and tuned for how best to become a future U.S. Citizen.

AR002446

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-zwaw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0790

Comment Submitted by Gabriel Martinez

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## Submitter Information

**Name:** Gabriel Martinez

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## General Comment

We Need To SAFEGUARD Our Country ASAP THANK YOU For Your Cooperation GABRIEL E. MARTINEZ

AR002447

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-iaqs
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0791

Comment Submitted by Steve DiStefano

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## Submitter Information

**Name:** Steve DiStefano

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## General Comment

It's about time you start realizing that we the American people put you there and we support President Trump. Stop obstructing and start helping get his policies which are our policies done.

AR002448

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-z86z
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0792

Comment Submitted by Allie Matthews

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## Submitter Information

**Name:** Allie Matthews

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## General Comment

The Democrats have made this country a disaster. Support President Trump's Immigration Reforms.

AR002449



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-3720
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0793

Comment Submitted by Edith Williams

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## Submitter Information

**Name:** Edith Williams

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## General Comment

Support President Trump's Immigration reforms. He truly is trying to improve life in our country for the average citizen, and not competing with illegals for jobs or not supporting them when they try to go on the dole is a fine start.

AR002450

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-hdz4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0794

Comment Submitted by Tommy Wade

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## Submitter Information

**Name:** tommy wade

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## General Comment

STAND WITH THIS PRESIDENT AND HIS IMMIGRATION REFORMS!! SUPPORT THE AMERICAN  
PEOPLE AND THIS PRESIDENT!!

AR002451

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-o3xk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0795

Comment Submitted by Joseph Riviuccio

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## Submitter Information

**Name:** Joseph Riviuccio

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## General Comment

I believe putting a time limit on background checks put our country at risk. the 30 day restriction needs to be removed and replaced by 90 days

AR002452

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-zor2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0796

Comment Submitted by Robert Miller

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## Submitter Information

**Name:** Robert Miller

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## General Comment

Please support president Trumps efforts to reform the immigration reform. This system is broken and deserves our attention now!

AR002453

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-gh40
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0797

Comment Submitted by Sherrie McDougale

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## Submitter Information

**Name:** Sherrie McDougale

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## General Comment

Support President Trump in everything he is trying to do to better secure our country.

Thank you

AR002454

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-2q2r
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0798

Comment Submitted by John Keon

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## Submitter Information

**Name:** John Keon

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## General Comment

Support President Trump's immigration reforms.

Keep our country safe. Our ancestors came here LEGALLY. They had sponsors.

AR002455

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-pxqz <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0799

Comment Submitted by Jason Jackson

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## Submitter Information

**Name:** Jason Jackson

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## General Comment

Just wanted to send quick message asking you to support President Trumps immigration reforms. Stop the influx of illegals flooding the country for free handouts & put some order back into the immigration process. People coming here should actually want to be here & want to better themselves & stand shoulder to shoulder with the American people & not just continue hiding in the shadows taking free handouts w/ no intent to ever assimilate or participate in the things that make America the greatest country on the planet. Lawlessness along the border should be ended with all possible urgency by removing the drug/human traffickers and gang presence.

AR002456

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-29z8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0800

Comment Submitted by John Shearin

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## Submitter Information

**Name:** John Shearin

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## General Comment

I support his policies period.

AR002457



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-tdr8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0801

Comment Submitted by CarolD Whisnant

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## Submitter Information

**Name:** CarolD Whisnant

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## General Comment

We must have managed immigration to ensure there is a place to work, live, grow, and enjoy life. There are far too man people on the street starving and begging. Open border sounds good but not working.

AR002458

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-vnhr <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0802

Comment Submitted by Robert Brown

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## Submitter Information

**Name:** Robert Brown

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## General Comment

Only LEGAL IMMIGRATION

AR002459

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-50t8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0803

Comment Submitted by Amanda Litton

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## Submitter Information

**Name:** amanda litton

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## General Comment

SUPPORT OUR PRESIDENT IN THE IMMIGRANT RIGHT NOW!!!!

AR002460

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-a0qm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0804

Comment Submitted by Ted Proske

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## Submitter Information

**Name:** Ted Proske

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## General Comment

Please support POTUS Trump's immigration reforms to the hilt. We need to STOP illegal immigration NOW!  
Thank You.

AR002461

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-f8pk <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0805

Comment Submitted by Charles Keller

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## Submitter Information

**Name:** charles keller

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## General Comment

Please write your comment here. I am behind trump to do what ever means is necessary on immigration issue.

AR002462

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-8kbn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0806

Comment Submitted by Amelia Delgadillo

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## Submitter Information

**Name:** Amelia delgadillo

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## General Comment

Best President ever  
Trump 2020.

AR002463

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-889k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0807

Comment Submitted by Barbara Allen

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## Submitter Information

**Name:** Barbara Allen

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## General Comment

We need immigration reform! I am a 75 year old woman, recently retired and in my job i saw people here receiving multiple benefits, who had never worked in this country. That is disheartening, however if the immigrant comes here legally i do not have a problem with it. It is the illegal persons that I do not want to pay for. I have to follow the rules and so should they.

AR002464

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-v5ae
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0808

Comment Submitted by Marklyn Gauvin

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## Submitter Information

**Name:** Marklyn Gauvin

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## General Comment

Get your act together with this immigration

AR002465



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-qtjp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0809

Comment Submitted by Stephanie Bickham

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## Submitter Information

**Name:** Stephanie Bickham

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## General Comment

Do your job for the American people who voted you in....Support POTUSs Immigration Reform!!!

AR002466

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-cnww
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0810

Comment Submitted by Mary Kaiserman

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## Submitter Information

**Name:** Mary Kaiserman

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## General Comment

I believe what President Trump is doing regarding immigration reform is what our country needs. We need to stop the birth right of babies born to illegals and the fact that illegals can bring over relative they have. We need people emigrating to America to contribute not just take free everything. Currently illegals are given more benefits and treated better than American citizens. Illegals should not be given

AR002467

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-ul9j
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0811

Comment Submitted by Neil Harris

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## Submitter Information

**Name:** Neil Harris

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## General Comment

Its time to get illegal immigration under control. Its time to support President Trump and start moving the country forward, rather than moving personal power-driven agendas forward. As a constituent, I expect you to do the right thing.

AR002468

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5l-sll2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0812

Comment Submitted by Linda Nichols

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## Submitter Information

**Name:** Linda Nichols

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## General Comment

Please support our President on immigration. Stop all support on illegal immigrants.Thank you!

AR002469

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-cjlg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0813

Comment Submitted by Jerry Payseno

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## Submitter Information

**Name:** Jerry Payseno

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## General Comment

Use common sense and support president Trump's plan for immigration us hard working Americans are tired of all crap.

AR002470

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-xv5w <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0814

Comment Submitted by Scott Walter

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## Submitter Information

**Name:** Scott Walter

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## General Comment

Please support Pres. Trumps reforms

AR002471

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-k1m0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0815

Comment Submitted by Michael Fields

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## Submitter Information

**Name:** Michael Fields

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## General Comment

I have travel the world. I have had to have a passport to leave and return the United States.  
WHAT IS THE PROBLEM WITH PEOPLE FROM OTHER COUNTRIES DOING THE SAME?  
Support The President on his reforms. WITH NO QUESTIONS ASKED.  
M.G.Fields

AR002472

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-vewi <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0816

Comment Submitted by Mary Roppelt

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## Submitter Information

**Name:** Mary Roppelt

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## General Comment

Americans Citizens come first. Immigrants need to come in legally. I am sick of the mexican drug cartel taking over our Country. Wake the hell up.

AR002473



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-velu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0817

Comment Submitted by Ileana Schneegans

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## Submitter Information

**Name:** Ileana Schneegans

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## General Comment

Please write your comment here.

I support President Trump 100% in regards to immigration. It is crazy to allow thousands of illegals to come in with no justification whatsoever for requesting asylum. I do not support illegal immigration because it is AGAINST THE LAW OF THE USA.

AR002474

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-unj2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0818

Comment Submitted by Frank Nash

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## Submitter Information

**Name:** Frank Nash

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## General Comment

I'm with the President, we need these reforms to keep our country safe and healthy. Healthy meaning a place where we want to live free from all the garbage the Democrats want !!

AR002475

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-zicj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0819

Comment Submitted by Edwin Henneberg

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## Submitter Information

**Name:** Edwin Henneberg

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## General Comment

When one seeks entry to this country ..they . leave behind their past. And live under our laws.

Wear our clothes. Not burka. Or middle east clothes.

AR002476

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-hupo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0820

Comment Submitted by Judee Blaich

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## Submitter Information

**Name:** Judee Blaich

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## General Comment

I support the removal of all people who are in the US ILLEGALLY plus keep all asylum seekers out until they are fully investigated.

AR002477

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-1ohs <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0821

Comment Submitted by Christine Pazdur

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## Submitter Information

**Name:** christine Pazdur

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## General Comment

Me and thousands more people are pissed at the Democrats. They need to stop messing around with the president. Leave mr. Trump alone and do your job. What you were hired to do drain the swamp get rid of those morons.

AR002478

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-hc9i <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0822

Comment Submitted by Sandra Stake

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## Submitter Information

**Name:** sandra stake

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## General Comment

We have American citizens that need help, housing and medical care. We certainly should NOT be paying for non citizens and encouraging them to come here when they cannot pay for their own care. Hello is anyone there listening?

AR002479

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-adk6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0823

Comment Submitted by James Blair

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## Submitter Information

**Name:** James Blair

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## General Comment

Support the President's immigration reforms. It is long past time to put the American people first. The present rules and regulations are simply ill conceived and poorly implemented. Support the President's reforms now.

AR002480

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-ba45
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0824

Comment Submitted by Sharon Atkinson

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## Submitter Information

**Name:** Sharon Atkinson

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## General Comment

Support President Trump's Immigration Reform. Build the damn WALL. God Bless President Trump and God Bless America.  
TRUMP/PENCE 2020.

AR002481



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-ueta <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0825

Comment Submitted by Gary Goodman

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## Submitter Information

**Name:** Gary Goodman

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## General Comment

The immigration reforms must be supported.

AR002482

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-ii01
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0826

Comment Submitted by Judith Sommer

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## Submitter Information

**Name:** Judith Sommer

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## General Comment

Thank you for your consideration in this matter.

AR002483

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-q4yk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0827

Comment Submitted by Denice Brown-Sweeney

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## Submitter Information

**Name:** Denice Brown-Sweeney

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## General Comment

Please refrain from the present insanity in the H.R. and support decent immigration reforms or we will no longer have a country left for which you would have any place to represent.

AR002484

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-1d1k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0828

Comment Submitted by Chaille Shipps

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## Submitter Information

**Name:** Chaille Shipps

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## General Comment

Support President Trump & Cunicelli on immigration reform and vet each immigrant & their reasons for wanting to call this country their own!!!

AR002485

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-lrao <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0829

Comment Submitted by Charles Campbell

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## Submitter Information

**Name:** Charles Campbell

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## General Comment

Please write your comment here. please do your sworn duty to the Constitution of The United States and assist our duly elected President with your very best ability to protect the citizens of our great country by preventing illegal aliens entry into our country.

AR002486

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-bofw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0830

Comment Submitted by Pastor Siebers

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## Submitter Information

**Name:** PASTOR SIEBERS

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## General Comment

ALMOST EVERYONE IN CONGRESS IS SOLD OUT TO MAKING TRUMP LOOK BAD. DIGGING A HOLE FOR THEMSELVES. THE AMERICAN PEOPLE ARE NOT STUPID. SUPPORT TRUMPS IMMIGRATION REFORM.

AR002487

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-qnkh <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0831

Comment Submitted by Jim Crowhurst

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## Submitter Information

**Name:** Jim Crowhurst

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## General Comment

In lieu of Congress' lack of action, President Trump must control the U.S. Border Crisis. You must support President Trump's Immigration reforms.

Thanks,  
Jim Crowhurst

AR002488

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-th3d
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0832

Comment Submitted by Paul Alley

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## Submitter Information

**Name:** paul alley

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## General Comment

Support President Trump in his push to construct the border wall and his immigration reforms. Stop using tax payer \$ for illegal aliens. If members of the Democratic party want to spend money on illegal aliens they should spend their own money.

AR002489



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-p80s
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0833

Comment Submitted by Robert Nowell

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## Submitter Information

**Name:** Robert Nowell

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## General Comment

THE MOST IMPORTANT aspect of the immigration process is the vetting. ANY proposal that weakens vetting is putting the American people at risk and must be ash canned. Arbitrary timelines should NOT take precedence over thorough live saving vetting.

What ever time constraints put on the administration must be removed and a thorough vetting required for every person immigrating and crossing our borders. The more they cross the deeper the vetting, but really the vetting should be as deep as possible.

This is NOT a racist requirement as it doesn't matter who they are or where they are from.

I do thing that if some of the time delay is caused by lack funding we should allow those with the means to supply the funding to pay for extra personal to speed up their processing, but this additional speed should in no way diminish the thoroughness of the vetting, in fact, ideally, it should add even more thorough vetting as a requirement to get the enhanced speed.

Bottomline, NOTHING should override the requirement for the most thorough vetting possible.

AR002490

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-35mw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0834

Comment Submitted by Jack Palmer

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## Submitter Information

**Name:** JACK PALMER

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## General Comment

PLEASE allow our president to have the time he needs to process the people that come over our borders illegal and give them due process.Thank you.

AR002491

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-qvrb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0835

Comment Submitted by Shelton Davis

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## Submitter Information

**Name:** Shelton davis

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## General Comment

Please support President trumps immigration plan and then take your big fat overpaid pensions and retire thank you

AR002492

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-4f71
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0836

Comment Submitted by Thomas Sartain

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## Submitter Information

**Name:** Thomas Sartain

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## General Comment

Support President Trump or Else!

AR002493

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-57bx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0837

Comment Submitted by Kathy Skawinski

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## Submitter Information

**Name:** Kathy Skawinski

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## General Comment

We support President Trump's Immigration Reforms 100%. They protect our national security; which is the major purpose of having a federal government! As a member of Congress, representing the best interests of America and Americans, we expect you to do the same.

AR002494

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-wudb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0838

Comment Submitted by Larry Chappell

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## Submitter Information

**Name:** Larry Chappell

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## General Comment

Please, Support President Trump's Immigration Reforms. We need to protect our country, our borders, and make it fair for those who come to our country legally. Thank you!

AR002495

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-n8c6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0839

Comment Submitted by David Browne

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## Submitter Information

**Name:** David Browne

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## General Comment

We need President Trumps immigration reforms now.

AR002496

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-nudn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0840

Comment Submitted by Gilda Forster

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## Submitter Information

**Name:** Gilda Forster

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## General Comment

I am requesting that you remove the 30-day restriction to screen Asylum seekers. With the number of people trying to enter our country, more time is needed to get this job done,

AR002497



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-hltl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0841

Comment Submitted by Stephan Starkey

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## Submitter Information

**Name:** Stephan Starkey

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## General Comment

It's time for you bureaucrats to get out of the way and let the proper law be passed to fix this Citizenship and Immigration problem.

AR002498

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-umne
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0842

Comment Submitted by Don Veazey

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## Submitter Information

**Name:** Don Veazey

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## General Comment

There are those who are fighting to protect the Beltways beloved status quo. They don't care that the current system punishes people for coming here LEGALLY or that it weakens our national security.

I understand that by law, the Executive Branch has a mere 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit. It is clear to me that this forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are playing by the rules. That makes absolutely no sense! Can you possibly explain to an ordinary tax paying citizen why anyone would support a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline? I beg you, remove these ridiculous restrictions and secure Americas safety.

I'm counting on you doing the right thing: set standards and rules that preserves our security and gives equal opportunity to all who come here seeking asylum.

AR002499

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-hyk8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0843

Comment Submitted by Phillip York

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## Submitter Information

**Name:** Phillip York

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## General Comment

Build that wall!

AR002500

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-eo8a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0844

Comment Submitted by Sandra Lankford

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## Submitter Information

**Name:** SANDRA LANKFORD

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## General Comment

Please support President Trump's immigration reforms as we simply cannot afford what is going on at present.

AR002501

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-h4s5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0845

Comment Submitted by Sharon Atkinson

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## Submitter Information

**Name:** Sharon Atkinson

---

## General Comment

Support President Trump's Immigration Reform. Deport illegals. Build the Wall. Trump/Pence 2020

AR002502

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-7ra7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0846

Comment Submitted by Dale Jarmush

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## Submitter Information

**Name:** Dale Jarmush

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## General Comment

I support Immigration Reforms proposed by President Trump. Please support these too!

AR002503

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-nzcd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0847

Comment Submitted by Ramona Huddleston

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## Submitter Information

**Name:** Ramona Huddleston

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## General Comment

Sopppp

Support Trump Immigration policy.

AR002504

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-686v
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0848

Comment Submitted by Carol Workman

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## Submitter Information

**Name:** Carol workman

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## General Comment

Support president trump, in all his reforms. He knows what he's doing and what is best for America and its people . Trump 2020!

AR002505



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5l-yb47
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0849

Comment Submitted by Diana Woolnough

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## Submitter Information

**Name:** Diana Woolnough

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## General Comment

Dear Sir

Please put a stop to all of the caoss at the boarder., and bring back civility in the HOUSE. We all know that we need legal immigration and a complete STOP to illegal immigration as both sides in the past have agreed on. Please SUPPORT our PRESIDENT'S Immigration reforms.

AR002506

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-1tw0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0850

Comment Submitted by Deb Barrick

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## Submitter Information

**Name:** Deb Barrick

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## General Comment

It's time to support President Trump and secure our borders. No more time, energy or money should be given to illegal invaders. Send them all back to their home countries. Spend that time, energy and money on AMERICANS. Any official who approved sanctuary city/state status, without a vote of the People, should be jailed. Protect American citizens. Believe it or not, that's your job.

AR002507

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5l-hyc9 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0851

Comment Submitted by Martha Bullock

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## Submitter Information

**Name:** Martha Bullock

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## General Comment

Please consider using measures to extend the 30 day period of vetting illegal immigrants whenever there is an unusually high number of illegal immigrants trying to enter our country. Please support fair entry methods for those law abiding people trying to enter our country in a legal and orderly manner. Also please give financial support for completing the wall to deter illegal entry into our country.

AR002508

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-nd2t
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0852

Comment Submitted by Robert Williams

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## Submitter Information

**Name:** Robert Williams

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## General Comment

I strongly urge you to support President Trumps Immigration reforms.

AR002509

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-64mk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0853

Comment Submitted by Elena Sanchez

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## Submitter Information

**Name:** Elena Sanchez

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## General Comment

I stand with My President in support of Immigration Reform. Sincerely Elena Sanchez

AR002510

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-c5rh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0854

Comment Submitted by Bill Galli

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## Submitter Information

**Name:** Bill Galli

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## General Comment

Please reform our broken unsustainable immigration system including our pathetic anchor baby /amnesty elements as well

AR002511

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-7e49 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0855

Comment Submitted by Beverly Bedsaul

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## Submitter Information

**Name:** Beverly Bedsaul

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## General Comment

Please support President Trump in his efforts to institute Immigration Reforms.

AR002512

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-7lgj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0856

Comment Submitted by Ed Kirkham

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## Submitter Information

**Name:** Ed kirkham

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## General Comment

I support your immigration policy Mr president . Edmond Oklahoma, Ed Kirkham \*

AR002513



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-f4ml
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0857

Comment Submitted by Michael Burns

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## Submitter Information

**Name:** Michael Burns

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## General Comment

Support Our President Donald Trump! End the Invasion of America! & stop the coming Civil War!!  
America 1st/Americans 1st Period.

AR002514

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-vga9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0858

Comment Submitted by Mark Favreau

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## Submitter Information

**Name:** Mark Favreau

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## General Comment

Build the Wall and stop illegal immigration.  
We have too many illegal immigrants in the country already.

The Democrats oppose it simply because they want the Hispanic vote.

AR002515

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-1t69
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0859

Comment Submitted by Karen Hensley

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## Submitter Information

**Name:** Karen Hensley

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## General Comment

Instead of working with President Trump to fix our broken immigration system, radical Leftists are fighting to protect the Beltways beloved status quo.

They don't care that the current system punishes people for coming here LEGALLY or that it weakens our national security. SUPPORT "OUR" PRESIDENT OF THE UNITED STATES!!!

AR002516

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-g71d
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0860

Comment Submitted by Tom Springs

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## Submitter Information

**Name:** Tom Springs

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## General Comment

As a tax payer and a conservative Christian ask you to please support President Trump's immigration reform. The present immigration format is not working. For the sake of hard working taxpayers, and people from other countries that go the legal way of living in the US please Make the changes needed that President Trump has outlined. Thanks for your service and your voters will thank you too.

AR002517

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-pyyj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0861

Comment Submitted by Mike Brownlow

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## Submitter Information

**Name:** Mike Brownlow

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## General Comment

Please support President Trumps immigration policies for America

AR002518

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-881o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0862

Comment Submitted by William Bost

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## Submitter Information

**Name:** William Bost

---

## General Comment

This is totally ridiculous. The Trump Administration only 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit. You do know, this forces bureaucrats to cut corners on background checks and divert valuable resources away from immigrants who are playing by the rules. This is totally INSANE! Change this law now for the safety of the U.S.

AR002519

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5l-p19o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0863

Comment Submitted by George Gurney

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## Submitter Information

**Name:** George Gurney

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## General Comment

Please support President Trump's immigration reforms. Those that decide to enter our country illegally are breaking our laws and need to be caught and deported immediately.

AR002520

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5k-ffhl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0864

Comment Submitted by Kevin Toohig

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## Submitter Information

**Name:** Kevin Toohig

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## General Comment

Our safety first there feelings last are you people sucking around for another 9/11

AR002521



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-fjsh <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0865

Comment Submitted by Joanne Fulsaa

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## Submitter Information

**Name:** Joanne Fulsaa

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## General Comment

Please take away the ridiculous rule that only allows 30 days to check immigrants.

AR002522

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-i9rm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0866

Comment Submitted by Deborah Varnell

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## Submitter Information

**Name:** Deborah Varnell

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## General Comment

I completely support the Presidents immigration policy. We cannot remain a secure nations without borders and enforcement of sensible immigration policy. Stop your nonsense and do your job to protect the American people the ones who are already here, not those entering illegally!

AR002523

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-6vty <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0867

Comment Submitted by Kyle Knott

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## Submitter Information

**Name:** Kyle Knott

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## General Comment

This country of immigrants has the right to know who is entering our nation. We need a thorough background check on all individuals and the people who are speaking for them. The current policy is long over due for a overhaul to meet current demands and to close loop holes. We a need straight forward policy that is easier to understand and implement

AR002524

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-tiil <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0868

Comment Submitted by Dennis Zeimet

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## Submitter Information

**Name:** Dennis Zeimet

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## General Comment

America and Americans first! Period!!!

AR002525

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-cyo6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0869

Comment Submitted by Georgia Muncaster

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## Submitter Information

**Name:** Georgia Muncaster

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## General Comment

Please screen those seeking asylum

AR002526

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-euli
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0870

Comment Submitted by ROSEMARY WALT

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## Submitter Information

**Name:** ROSEMARY WALT

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## General Comment

Congressmen and women, PLEASE DO YOUR JOB. Support President Trump in his quest to make immigration easier for those who seek to become citizens LEGALLY.

The current charade is so completely unfair to those who come here legally.

AR002527

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-52o6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0871

Comment Submitted by Rick Lisenbe

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## Submitter Information

**Name:** Rick Lisenbe

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## General Comment

Change the insane 30 day asylum law. Change it to whatever is needed to adequately vent each asylum seeker based on the resources available to properly do this critical task.

AR002528

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-vrpg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0872

Comment Submitted by Dennis Davis

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## Submitter Information

**Name:** DENNIS DAVIS

---

## General Comment

By law, the Trump Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

This forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are playing by the rules. Thats INSANE!

Give them 6 months to check and deport them without cause of any kind !

AR002529



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-xb82 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0873

Comment Submitted by Pamela Welsh

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## Submitter Information

**Name:** Pamela Welsh

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## General Comment

Washington-all of Washington needs to support President Trump's immigration reforms. Everyone needs to begin carrying out the job they were elected to and forget all the Partisan politics.

AR002530

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-1dhs
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0874

Comment Submitted by Carol Welch

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## Submitter Information

**Name:** Carol Welch

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## General Comment

It is unfair to those who are trying to legally come into this country and the taxpayers who have to pay for these illegals entering for health care, education, and the diseases and drugs they bring with them. They are over burdening communities and committing crimes against Americans. Please write your comment here.

AR002531

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-wutu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0875

Comment Submitted by Anne Zack

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## Submitter Information

**Name:** Anne Zack

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## General Comment

Please listen to the American people and stop giving out free healthcare. Education and aide to liiegal immigrants. Enforce our laws that are already established!

AR002532

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-fuoj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0876

Comment Submitted by Sharon Groth

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## Submitter Information

**Name:** Sharon Groth

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## General Comment

Your duty is to support President Trump's Immigration Policy Reforms. He is trying to protect our country and our people. If the Immigration Reforms are upheld then crime will go down.

So, please help him pass these Reforms.

AR002533

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-rqc7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0877

Comment Submitted by Denny Muller

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## Submitter Information

**Name:** Denny Muller

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## General Comment

We've had it with you jerks! Millions of dollars wasted and NOTHING being done. Trump is the ONLY one working for We The People!  
Defend OUR President or we WILL REPLACE YOU!

AR002534

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-5c1t
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0878

Comment Submitted by Janet Brock

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## Submitter Information

**Name:** Janet Brock

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## General Comment

Please support President Trumps immigration reforms. Im concerned that the democrats are running wild with a lust for power and will allow illegals to vote. What point will it be to be an US citizen? Our country will be thrown away to socialism.

AR002535

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5e-1ath <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0879

Comment Submitted by Cynthia Tucker

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## Submitter Information

**Name:** Cynthia Tucker

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## General Comment

This needs Your Attention !!!

AR002536

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-jrqp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0880

Comment Submitted by Patrick Piper

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## Submitter Information

**Name:** Patrick Piper

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## General Comment

Please support our duly elected President and protect American interests.

AR002537



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-h6oj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0881

Comment Submitted by Sarah Nugent

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## Submitter Information

**Name:** Sarah nugent

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## General Comment

Back President Trump all the way on policy.

AR002538

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-t1zp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0882

Comment Submitted by Judy Kozlowski

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## Submitter Information

**Name:** Judy Kozlowski

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## General Comment

President Trump's Immigration Reforms MUST BE SUPPORTED. I SUPPORT HIM ALONG WITH MANY, MANY, MANY, MANY, MANY, MANY, MANY, MANY, MANY OTHER PEOPLE!  
YOU need to SUPPORT HIM TOO!

AR002539

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-acxr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0883

Comment Submitted by Claudine Hale

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## Submitter Information

**Name:** Claudine Hale

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## General Comment

As an American citizen, I am strongly concerned about the immigration problem in our nation. After assessing the information on this issue, I am asking you to support President Trump's immigration policy. We must save our country. We are not the Pratorian Guard of the world.

AR002540

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-w5z4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0884

Comment Submitted by Randy Vandegrift

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## Submitter Information

**Name:** Randy Vandegrift

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## General Comment

The Fair Report estimated that our country spent \$135 billion to support those here in the US illegally in 2016. In 2015, the surge of illegals saw diseases pop up that we thought were under control or not previously seen here. Over 20% of the population of our prisons are composed of those here illegally. 50% of our STEM graduates can't find STEM jobs because of the flood of work visas going to foreigners. It is estimated that from this point in time, over 80% of our population growth will come from legal immigrants and anchor babies, putting intense pressure on our resources and crumbling infrastructure. One study found that over 50% of those who emigrated here are STILL receiving support after being here 5 years. And on and on and on. Illegal immigration MUST be stopped; anchor babies MUST be overturned; E-Verify MUST be used; allowing immigrants to bring their families MUST be ended; legal immigrants MUST have an education, skill or trade that allows them to contribute to our economy from the time they set foot in our country! You and your colleagues have kicked far too many issues down the road and we are facing an impending disaster of issues. DO SOMETHING POSITIVE NOW and start with the issue of immigration. NO more illegals; legal immigration limited to between 250,000 and 500,000 per year. We need common sense reform before we lose our country!

AR002541

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-wi4x <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0885

Comment Submitted by Willard Killingsworth

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## Submitter Information

**Name:** Willard killingsworth

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## General Comment

Stop illegal immigration. Help the legal ones

AR002542

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5c-vruy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0886

Comment Submitted by Joan Earl

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## Submitter Information

**Name:** Joan Earl

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## General Comment

Please support the President's Immigration reforms now.

AR002543

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-3tm0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0887

Comment Submitted by Terri Barrett

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## Submitter Information

**Name:** Terri Barrett

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## General Comment

Please support President Trumps Immigration Reforms. Protect our Country. The Left is OUT of CONTROL

AR002544

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-weft
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0888

Comment Submitted by Michael Damore

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## Submitter Information

**Name:** Michael Damore

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## General Comment

Support the president's immigration reforms. For I am sick of my hard earned tax dollars being pissed away on illegals taking the services that are supposed to be for Americans.

AR002545



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-c666
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0889

Comment Submitted by David Tull

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## Submitter Information

**Name:** David Tull

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## General Comment

Reform Immigration Issues.

AR002546

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-clyc <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0890

Comment Submitted by Margaret Roche

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## Submitter Information

**Name:** Margaret Roche

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## General Comment

STOP thinking of your little, obstructive ideas to make THIS country unsafe, and support President Trump's reforms. I'll bet your constituents have had enough of your ridiculous interference in immigration reform!

AR002547

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5e-eets <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0891

Comment Submitted by Ann Brannan

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## Submitter Information

**Name:** Ann Brannan

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## General Comment

We want you to support President Trump's Immigration Reforms. We want to keep our Nation safe!

AR002548

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-wgyk <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0892

Comment Submitted by Linda Handwerk

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## Submitter Information

**Name:** Linda Handwerk

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## General Comment

I support Presidency Trump on this issue

AR002549

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-ocln
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0893

Comment Submitted by Lynne Morand

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## Submitter Information

**Name:** Lynne Morand

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## General Comment

Please support President Trumps immigration reforms! So many of our U.S. seniors need help financially & cant get any, but illegals get everything free! This is. Very, very wrong!

AR002550

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-351s <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
---

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0894

Comment Submitted by Joseph Hines

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## Submitter Information

**Name:** Joseph Hines

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## General Comment

Support our President !!!!! MAGA. !!!!

AR002551

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-icoy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0895

Comment Submitted by Phyl Morello

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## Submitter Information

**Name:** Phyl Morello

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## General Comment

STOP ILLEGALS FROM COMING INTO THE US!!!!!! DO NOT GIVE ASYLUM TO ANY ILLEGAL!!!!

AR002552

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-i4so
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0896

Comment Submitted by Steve Theis

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## Submitter Information

**Name:** steve theis

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## General Comment

we need immigration reform asap please it is long over due and being abused more than ever thank you go get em

AR002553



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-zx2m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0897

Comment Submitted by Kathryn Lucarelli

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## Submitter Information

**Name:** Kathryn Lucarelli

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## General Comment

It is time to stand up and do the right thing!!!

STOP the nonsense !! Get rid of the REDTAPE and help the legals to start their new lives in The Great USA!!!!!!!!!!

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-w2ad
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0898

Comment Submitted by Deborah Carper

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## Submitter Information

**Name:** Deborah Carper

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## General Comment

Support President Trump's immigration reform! This is one of the main reasons he won the office. It's what the WORKING people of this country want! And build that wall ASAP!

AR002555

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-lmlr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0899

Comment Submitted by Victor Imperato

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## Submitter Information

**Name:** victor imparato

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## General Comment

I SUPPORT THE PRESIDENTS IMMIGRATION REFORMS

AR002556

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5g-ympw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0900

Comment Submitted by Linda Checketts

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## Submitter Information

**Name:** Linda Checketts

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## General Comment

Support your duly elected President instead of fighting him at every turn. Give him the respect he is due. He has done so much for us so far let him continue. God be with you President Trump. I'm with you.

AR002557

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-wxse
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0901

Comment Submitted by Carol Deutsch-Schmidt

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## Submitter Information

**Name:** Carol Deutsch-Schmidt

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## General Comment

Please support President Trump's immigration reform strategies! The US cannot continue with the broken laws, open borders and millions of illegals overwhelming our system!  
Give our jobs to Americans! Reduce the H1 Visas allowing millions of foreign workers and their families into our country taking our jobs!  
Stand up for US citizens!

AR002558

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-1a12
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0902

Comment Submitted by Cheryl Newell

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## Submitter Information

**Name:** Cheryl Newell

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## General Comment

The flood of illegal immigrants, including violent criminals, the sanctuary cities that protects them in violation of our immigration laws, and the diseases that are being reintroduced to our country are all threats to our national security. Please support all of President Trump's Immigration reforms. Thank you.

AR002559

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-nbi1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0903

Comment Submitted by Sharon Koke

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## Submitter Information

**Name:** Sharon Koke

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## General Comment

We need some laws about Illegal aliens because they are illegal remember that first of all

AR002560

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-8lte
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0904

Comment Submitted by Donald Samples

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## Submitter Information

**Name:** donald samples

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## General Comment

its time to throw politics out the window, as you see all the noise about impeachment comes from liberal states repersentaives dont really care about AMERICANS thats why we need term limits to take our country back from DC

AR002561



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-h5of
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0905

Comment Submitted by Mell Reed

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## Submitter Information

**Name:** Mell Reed

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## General Comment

We totally support our President and all in his administration. God bless Preaident Trump and God bless America.

AR002562

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-kroh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0906

Comment Submitted by Henry Knodel

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## Submitter Information

**Name:** Henry Knodel

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## General Comment

Support the immigration reforms that the President submitted. Get on the band wagon and let's move ahead.

AR002563

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-4oq1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0907

Comment Submitted by MaryElizabeth Grove

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## Submitter Information

**Name:** MaryElizabeth Grove

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## General Comment

Spend more time doing your job and supporting our country and stop the infantile effort to impeach a President that was duly elected , Thank God we didnt get Hillary the Horrible . Otherwise you wont get my vote and anyone I know .

AR002564

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-6em2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0908

Comment Submitted by Jeanne Nixon

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## Submitter Information

**Name:** Jeanne Nixon

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## General Comment

I'm calling to tell Washington to support President Trump's immigration reforms. Stand with Trump on his immigration reforms please thank you.

AR002565

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-h444
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0909

Comment Submitted by George Chaco

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## Submitter Information

**Name:** George Chaco

---

## General Comment

Please support President Trump's Immigration Reforms, they make sense!

AR002566

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-8kcx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0910

Comment Submitted by Elizabeth Ownbey

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## Submitter Information

**Name:** Elizabeth Ownbey

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## General Comment

Immigration reform has desperately been needed for decades ..illegals cost us billions! Build the wall...change laws, end anchor babies...wake up..no benefits They Are Illegal!!!! They are criminals often, they hate America and Muslims want to destroy us. Wake Up end sanctuary cities!!!! Help keep safe Americans! It is your job! God bless our courageous successful President Trump!

AR002567

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5i-mjt0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0911

Comment Submitted by Nancy Kogan

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## Submitter Information

**Name:** Nancy Kogan

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## General Comment

Please change your rules for the immigrants. They are overrunning our country and only want our welfare monies !

Take time to interview thoroughly those people. No drug dealers, people stealers, anchor babies! We need people who will work hard and assimilate to become American citizens like our forebears did! They must learn English!

We are wasting a lot of government resources on spoonfeeding them with

printing papers in their language. You are in American. Devote yourself to be an American and a good citizen.

AR002568

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-3zk6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0912

Comment Submitted by Michele Dearth

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## Submitter Information

**Name:** Michele Dearth

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## General Comment

The Left is supporting a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline. This has to change and it must change NOW!

Please help President Trump remove these ridiculous restrictions and secure Americas safety by supporting Trump's Immigration Reforms NOW!

AR002569



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-11c0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0913

Comment Submitted by Kathy Hasse

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## Submitter Information

**Name:** Kathy Hasse

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## General Comment

Please support the immigration reforms the President trying to get accomplished. The American people should be protected. Anyone who wants to come into our country can do so, but LEGALLY. Please support reform.

AR002570

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-b0k0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0914

Comment Submitted by Diane Ketchner

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## Submitter Information

**Name:** Diane Ketchner

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## General Comment

Please Support President Trump's Immigration Reform. Stop giving illegal immigrants more rights than Americans get. Protect America not infiltrate it with illegals!!!

AR002571

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-n8md
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0915

Comment Submitted by Barbara Ervin

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## Submitter Information

**Name:** BARBARA ERVIN

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## General Comment

Please simplify our broken immigration system so that it does not punish those who are trying to get into our country legally. The current rules take to long for those doing it the right way and costs them too much. My father came through Ellis Isle and learned English and worked and paid taxes. Help President Trump put something in place that reaches those goals.

AR002572

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-nhy0 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0916

Comment Submitted by Francis Gallo

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## Submitter Information

**Name:** Francis Gallo

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## General Comment

We need comprehensive Immigration Reforms NOW! We have been playing this silly game with our borders for too long. As a retired Law Enforcement Officer, I know all too well how porous our borders have become and it has to stop. Enough of the stupidity of trying to overthrow a duly elected president and start working for the people as you were sent to Washington to do. The People of this Country demand it! We elected Donald Trump to get these things done. Stop fighting him and DO IT!

AR002573

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5l-c7vq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0917

Comment Submitted by Genevieve Foltz

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## Submitter Information

**Name:** GENEVIEVE FOLTZ

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## General Comment

WE MEED TO SUPPORT PRESIDENT FOR OUR COUNTRIES SAFEYY.

AR002574

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-eipv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0918

Comment Submitted by jaffe perniciaro

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## Submitter Information

**Name:** jaffe perniciaro

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## General Comment

GET behind our PRESIDENT and protect our borders and FIX the problem once and for all!

AR002575

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5g-moyh <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0919

Comment Submitted by Russ Shearer

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## Submitter Information

**Name:** russ shearer

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## General Comment

Support the president

AR002576

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-a903
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0920

Comment Submitted by Ricky Newton

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## Submitter Information

**Name:** Ricky Newton

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## General Comment

Support integration reform, for once in your political life put politics aside and do something right for the American people

AR002577



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5f-k1d8 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0921

Comment Submitted by Deborah Bradshaw

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## Submitter Information

**Name:** Deborah Bradshaw

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## General Comment

Legal = Proper

Illegal = Improper

AR002578

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-f4ld
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0922

Comment Submitted by Connie Shaboo

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## Submitter Information

**Name:** Connie Shaboo

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## General Comment

The law is the law and it includes people of other countries who choose to break those laws as well as rules that must be followed by those who work in public service who take an oath to uphold these laws and rules. It's "We the People" not we the politicians for a very good reason, we vote you in and we can vote you out.

AR002579

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-c0lx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0923

Comment Submitted by Connie Wostrel

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## Submitter Information

**Name:** Connie Wostrel

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## General Comment

It is high time to stop all illegal immigration, seal all loopholes, stop all green cards, put the American citizen first and allow only a reasonable number of legal immigrants who will love, respect and bring unity to this great country. We must move again to one nation under God, with liberty and justice for all. We must weed out the Muslim Brotherhood and its far reaching arms who are entrenched in all agencies of our Federal Government. We are a free country because our Founders built our country on God and Christian principles with natural moral law. God bless America!

AR002580

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-txlm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0924

Comment Submitted by Jeffrey Oliver

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## Submitter Information

**Name:** Jeffrey Oliver

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## General Comment

Please fix our broken immigration system before liberals cause more partisan Balderdash!

AR002581

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-17td
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0925

Comment Submitted by Lori Lewis

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## Submitter Information

**Name:** Lori Lewis

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## General Comment

Please support President Trump's immigration reforms...I'm a registered CA voter.

AR002582

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5h-iv5h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0926

Comment Submitted by Carrol Brown

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## Submitter Information

**Name:** Carrol Brown

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## General Comment

Reform has to happen or we'll break Americas already exhausted budget. We can't be the worlds keeper!

AR002583

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-zdyy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0927

Comment Submitted by Marc Jeric

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## Submitter Information

**Name:** Marc Jeric

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## General Comment

Please consider!

AR002584

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-1d9u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0928

Comment Submitted by Bud Frei

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## Submitter Information

**Name:** Bud Frei

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## General Comment

Please vote to remove the resrtictions placed on asylum seekers and protect our National Security and the immigrants who are playing by the rules!

AR002585



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-vkt8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0929

Comment Submitted by Curt Kluesner

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## Submitter Information

**Name:** curt kluesner

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## General Comment

Support the President, and support his immigration reforms.

AR002586

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5l-wemh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0930

Comment Submitted by Dennis Grasmick

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## Submitter Information

**Name:** dennis grasmick

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## General Comment

Support President Trump's Immigration Reforms!

We don't need uneducated people on wefare!

AR002587

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-6udc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0931

Comment Submitted by Vic Avolio

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## Submitter Information

**Name:** Vic Avolio

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## General Comment

Please stop the unbelievable impeachment (coup) efforts and please start doing the nation's real business. Immigration just might be a good place to start. Please support the president's and Ken Cuccinelli's efforts to remove unreasonable restrictions, secure America's safety and provide fairness to legal immigrant applicants.

AR002588

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5i-r2zm <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0932

Comment Submitted by Gloria Mardis

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## Submitter Information

**Name:** gloria mardis

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## General Comment

Please help the president to fix the immigration system for legal immigrant. thank you for your help.

AR002589

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5e-tar5 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0933

Comment Submitted by Linda Brown

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## Submitter Information

**Name:** Linda Brown

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## General Comment

Thanking you when you Are Representing us, But we're Very Unhappy about the Ineffective Policies on the border that Do NOT Allow Enough Time for our authorities to Properly Screen those who are supporting to be our Front Lines of Defense! What 8s taking you to stir colleagues, shaming those liberal obstructionists when need be, to sense the fury of law abiding Americans who want our borders to protect us! It's shameless people who are obstructing the proper laws but we need politicians who hold them accountable and find ways around their obstructionist tactics. Yes, we are at a cold war within our own borders, partially because of this very subject. We will be praying for your successful campaigns. Sincerely, Linda Brown

AR002590

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-rod1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0934

Comment Submitted by Katy Kane

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## Submitter Information

**Name:** Katy Kane

---

## General Comment

It's ludicrous that those people who want to come into our country legally can't get the resources they need because of a timeline for those people that don't want to come into our country legally. So, I urge you to support President Trump's Immigration Reforms.

AR002591

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-uya1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0935

Comment Submitted by Michael Campbell

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## Submitter Information

**Name:** Michael Campbell

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## General Comment

Every container has a maximum capacity. We need President Trumps immigration reforms to keep our nation from being flooded with immigrants to unsustainable levels. A level of immigration must be maintained so that our nations standard of living is not lowered.

AR002592

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5d-zom2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
---

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0936

Comment Submitted by Arturo Fano

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## Submitter Information

**Name:** Arturo Fano

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## General Comment

Do your job!  
Get to work!

AR002593



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5c-mb3a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0937

Comment Submitted by David Letersky

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## Submitter Information

**Name:** David Letersky

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## General Comment

Please support President Trumps reforms, your job depends on it.

AR002594

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-i4v5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0938

Comment Submitted by Sharon Thomas

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## Submitter Information

**Name:** Sharon Thomas

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## General Comment

Please stop letting illegal immigrants and potential terrorists into our country. I support President Trump 100%.  
Keep America safe !

AR002595

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 06, 2019 <b>Tracking No.</b> 1k3-9d5h-5rc4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0939

Comment Submitted by Patricia Sanders

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## Submitter Information

**Name:** Patricia Sanders

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## General Comment

Work far the people

AR002596

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5f-sooo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0940

Comment Submitted by Viria Riek

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## Submitter Information

**Name:** viria riek

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## General Comment

We need to support the president's immigration reforms to protect all citizens. Come legally or go elsewhere.

AR002597

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5d-htku
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0941

Comment Submitted by Daniel Moline

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## Submitter Information

**Name:** Daniel Moline

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## General Comment

Stand up and support president Trump's Immigration Reforms!

AR002598

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5e-qdiv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0942

Comment Submitted by John Humphrey

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## Submitter Information

**Name:** John Humphrey

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## General Comment

I expect you to support President Trump's Immigration Reforms. Admit the system is broken and must be repaired now. Our country is being overrun by illegal immigrants mainly due to congress's failure to act on reforming the immigration Policies and blocking presidential actions for strictly political reasons. Time to do what is right for USA and all of us hard working citizens instead of illegals who have no constitutional rights as illegals.

AR002599

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0943

Comment Submitted by Harold Scheer

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## Submitter Information

**Name:** Harold Scheer

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## General Comment

PLEASE, PLEASE support President Trump's Immigration Reforms.

If you can make them even better, PLEASE DO SO.

THANK YOU VERY, VERY MUCH.

AR002600

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5p-8sq8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0944

Comment Submitted by Karl Obrien

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## Submitter Information

**Name:** Karl Obrien

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## General Comment

support Trump Immigration reform.

AR002601



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5p-w86w
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0945

Comment Submitted by teresa dawson

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## Submitter Information

**Name:** teresa dawson

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## General Comment

Please support President Trump in the immigration reforms. We have to be tough and stop the flow of new people, from countries that may be sending terrorists & criminals to our area. Also, we need to build the wall completely.

AR002602

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5p-ya1o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0946

Comment Submitted by David B

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## Submitter Information

**Name:** David B

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## General Comment

Why is abiding by the law now taboo democRATs?

AR002603

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 06, 2019
<b>Tracking No.</b> 1k3-9d5p-bvff
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0947

Comment Submitted by Melissa Fieleke

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## Submitter Information

**Name:** Melissa Fieleke

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## General Comment

I support President Trump. Hes there for the American People.

AR002604

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-c23v
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0948

Comment Submitted by Audrey Robert-Ramirez

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## Submitter Information

**Name:** Audrey Robert-Ramirez

**Address:**

50 Congress St

Boston, MA, 02148

**Email:** audrey@ramirezkain.com

**Phone:** 6175480010

**Fax:** 6175422331

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## General Comment

I represent asylum applicants in the greater Boston (MA) area and submit these comments in opposition to the Proposed Rule Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications (Sep. 9, 2019), DHS Docket No. USCIS-2018-0001 (hereinafter, the Rule). The Rule would eliminate the requirement that DHS adjudicate initial requests for employment authorization by asylum applicants within 30-days of filing.

The Rule will have significant and long-lasting negative effects on the ability of asylum applicants to support themselves and their loved ones while they are waiting for their claims to be heard. By definition, an asylum seeker is an individual who has suffered grave harm, including torture and sexual violence on account of a statutory protected ground, and who flees his or home country with very few possessions and little support or financial resources. Asylum seekers turn to the U.S. for a safe haven and protection. This rule to eliminate the 30-day processing time for work authorization will undermine asylum seekers abilities to sustain themselves. The proposed rule change will allow DHS to have unlimited time to decide if and when asylum seekers will be issued work authorization, during which time asylum seekers would have no means of supporting themselves and be forced to wait and survive on the charity of others. The Rule will only compound the devastating delays that many asylum seekers face.

Ensuring that asylum seekers can secure lawful employment as soon as possible is in the economic interest of the United States. According to the Department of Health and Human Services, refugees and their family members contributed more than \$343 billion in revenue to federal, state and local coffers. On balance, refugees contributed

AR002605

\$63 billion more than they received in benefits from various programs.

Given the fact that asylum seekers are fleeing persecution in their home countries, the vast majority do not have sufficient resources to support themselves and their families for the duration of their immigration proceedings. The rule to eliminate the 30-day adjudication requirement would impose additional hardship on asylum seekers because they would face uncertainty and inconsistency in DHS processing. The proposed Rule would prevent asylum seekers from being able to support themselves and their loved ones through lawful employment.

Asylum seekers already bear the burden of government back-logs and adjudication delays. Even with a return to the Asylum Offices processing of First in, First out, asylum applicants face great difficulties in getting their cases heard. When a decision on an asylum seekers case is delayed, it negatively impacts their ability to provide for themselves, support family, and build a life here in the United States. Many asylum seekers wait months, if not years, for their cases to be heard and then adjudicated.

Asylum seekers are already required to wait a lengthy period of 180-days before they are eligible for work authorization. During this time, as mentioned above, they rely on others for support to survive. Removing the 30-day processing time requirement would cause significant harm to already vulnerable individuals. Without a time limit for processing initial applications, DHS would have no incentive to adjudicate these cases in a timely manner and asylum seekers who are statutorily eligible to work would be unable to do so for an unknowable period of time.

We already see asylum seekers face significant barriers while waiting for the employment documents to be renewed. Eliminating the 30-day processing requirement would place initial EAD eligible asylum seekers in the same uncertain waiting period as renewal applicants, but it would be far worse for asylum seekers who were applying for work authorization for the first time as they would not have the ability to sustain themselves.

I am deeply concerned that, without the 30-day processing requirement, EAD applications from asylum seekers will be delayed indefinitely. Without access to work authorization, asylum seekers will not have the ability to support themselves and their families, build their lives, and contribute to our local economies. Asylum applicants will lack government-issued identification that helps them integrate into life in the United States. The right to seek safety and protection in the United States is unequivocal. By decreasing access to the tools that allow asylum applicants to meet their basic needs while waiting for decisions on their claims, the proposed rule is undercutting that fundamental right. Because this proposed rule change places a serious burden on the most vulnerable immigrants, I strongly oppose the proposed regulation and request that it be withdrawn.

Thank you,  
Audrey Robert-Ramirez

AR002606

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0949

Comment Submitted by Steven Snyder

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## Submitter Information

**Name:** Steven snyder

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## General Comment

Give Donald Trump the time he needs to vet the immigrants He needs

AR002607

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5s-ge8t <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0950

Comment Submitted by Jeannie Luttrell

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## Submitter Information

**Name:** Jeannie Luttrell

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## General Comment

Please support reform for failed immigration policies.

AR002608

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-grra
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0951

Comment Submitted by Denise Bass

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## Submitter Information

**Name:** Denise Bass

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## General Comment

To whom it may concern,

Please, support President Trump's attempts to safe guard our nation by allowing proper time and dedication to the vetting process of all those seeking asylum in the USA. Removed the time constraints so this process can be done accurately. Please, support Immigration reform! Thank you for your attention to this matter.

AR002609



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-1wj7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0952

Comment Submitted by Phyllis Atha

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## Submitter Information

**Name:** Phyllis Atha

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## General Comment

I support thorough background checks on immigrants without an arbitrary deadline. I also support building the wall and enthusiastically implementing our existing immigration law. Totally against sanctuary cities.

AR002610

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-k935
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0953

Comment Submitted by Sheryl Brewer

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## Submitter Information

**Name:** sheryl brewer

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## General Comment

If you as an official representative of US the people wont do your job and secure our southern border with common sense laws and keep allowing hundreds of thousands of people we know nothing about into OUR country while protecting foreign countries, you MUST give the PRESIDENT at least 120 days to properly vet them. IF NOT WE WILL VOTE YOU OUT

AR002611

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-budt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0954

Comment Submitted by Frank Giuffre

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## Submitter Information

**Name:** Frank Giuffre

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## General Comment

It's past time to fix the loopholes that are in our current immigration laws. There's things President Trump wants to be changed that make complete sense and are all to the benefit of the American people. Please take the time to listen to his sensical views and the logical changes he wants implemented. The voters of this country have spoken when they elected President Trump and his policies to make America the best and most wealthy country ever.

AR002612

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-xzbk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0955

Comment Submitted by Zam Joseph

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## Submitter Information

**Name:** Zam Joseph

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## General Comment

We support president Trump's Immigration Reforms. Thank you.

AR002613

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-gbdd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0956

Comment Submitted by Georgia Bach

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## Submitter Information

**Name:** georgia bach

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## General Comment

please keep this country safe.

AR002614

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-zv05 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0957

Comment Submitted by Susan Nichols

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## Submitter Information

**Name:** Susan Nichols

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## General Comment

Please, I am begging, support President Trumps Immigration Reform!

AR002615

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-xopx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0958

Comment Submitted by Wayne Pflueger

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## Submitter Information

**Name:** Wayne Pflueger

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## General Comment

Please do your job and not let anyone in this country that has not been thoroughly checked out Your job is to protect citizens, not cut corners

AR002616

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-u874
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0959

Comment Submitted by Jeanne Dunn

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## Submitter Information

**Name:** Jeanne Dunn

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## General Comment

Please give Trump and his team enough time to properly vet immigrants coming into our county. If they have nothing to hide, this should not be a problem.

AR002617



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-ixvg <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0960

Comment Submitted by Brandon Bunch

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## Submitter Information

**Name:** Brandon Bunch

---

## General Comment

Please fix our immigration system

AR002618

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5s-v4v8 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0961

Comment Submitted by Sally Graves

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## Submitter Information

**Name:** Sally Graves

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## General Comment

As a natural-born citizen that has served her country, I am placing this email in support of a secure border.

AR002619

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-k1yq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0962

Comment Submitted by Victoria Nielson, New York City Bar Association's Immigration and Nationality Law Committee

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## Submitter Information

**Name:** Victoria Nielson

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## General Comment

Please see the attached file from the New York City Bar Association's Immigration and Nationality Law Committee.

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## Attachments

2019597-Comments\_RemovalProcessingFINAL11.6.19

AR002620



**COMMITTEE ON  
IMMIGRATION & NATIONALITY LAW**

VICTORIA F. NEILSON  
**CHAIR**  
42 W. 44TH STREET  
NEW YORK, NY 10036  
Phone: (917) 499-8869  
[Vickie.neilson@gmail.com](mailto:Vickie.neilson@gmail.com)

November 6, 2019

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue NW Mailstop #2140  
Washington, D.C. 20529-2140

*Submitted via <https://www.regulations.gov>*

**Re: DHS Docket No. USCIS-2018-0001; Comments on proposed rulemaking re:  
Removal of 30-day Processing Provision for Asylum Applicant-Related Form I-765  
Employment Authorization Applications**

Dear Ms. Deshommes:

We, the undersigned committee of the New York City Bar Association (“City Bar”)<sup>1</sup>, respectfully submit this comment on the Department of Homeland Security’s Proposed Rule to remove the regulatory provision which provides that United States Citizenship and Immigration Services (USCIS) has thirty (30) days from the date an asylum applicant files the initial Form I-765, Application for Employment Authorization to grant or deny that initial employment authorization application, as published in the Notice of Proposed Rulemaking (NPRM) published on September 9, 2019 in the Federal Register, Vol. 84, No. 174, at 47148-170.<sup>2</sup>

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<sup>1</sup> With 24,000 members, the City Bar has a longstanding mission to equip and mobilize the legal profession to practice with excellence, promote reform of the law, and advocate for access to justice in support of a fair society.

<sup>2</sup> Additionally, the Department of Homeland Security (DHS) is considering in the Proposed Rule to remove 8 CFR § 208.7(d) which provides that in order for employment authorization to be renewed before its expiration, the application for renewal must be received by the Service 90 days prior to expiration of the employment authorization. The City Bar does not take a position on this rule change in light of the 180-day automatic extension of employment authorization for renewal applications filed before expiration, as provided for in 8 C.F.R. § 274a.13(d)(1)(iii).

## I. EXECUTIVE SUMMARY

The City Bar opposes the Proposed Rule because it will have a severely negative impact on asylum seekers' abilities to support themselves and their families while waiting for a final decision on their claims, as well as other substantial social and economic costs. The City Bar urges the Department of Homeland Security (DHS) to withdraw the Proposed Rule and continue complying with the existing terms of the *Rosario*<sup>3</sup> class action agreed partial implementation plan.

The current regulation requires that USCIS adjudicate an asylum applicant's initial application for employment authorization within 30 days. 8 C.F.R. § 208.7(a)(1). USCIS has the ability to stop the clock on the 30-day processing timeframe if it needs to request additional documentation from an applicant. Moreover, under the *Rosario* partial agreed implementation plan, USCIS must meet this regulatory requirement and provide regular updates to the district court regarding its compliance with the regulation. This regulation was promulgated under the authority of INA § 208(d)(2), which states that an applicant for asylum is not entitled to employment authorization prior to 180 days after the filing of the asylum application.

At the time of the implementation of the existing requirement, there was a clear recognition that the related 150-day post-asylum application period (before which an asylum applicant's initial application for employment authorization could not be filed) was a period "beyond which it would not be appropriate to deny work authorization to a person whose [asylum] claim has not been adjudicated." (59 CFR 14779-780).

The Proposed Rule would eliminate the 30-day processing deadline without replacing it with any other deadline and without any guarantee for the reasonable and timely adjudication of asylum applicants' initial employment authorization applications. While the City Bar believes that USCIS should comply with the *Rosario* class action agreed partial implementation plan and existing regulations, should the 30-day processing deadline be removed from the regulations, it must be replaced with a firm processing timeline that provides predictability to asylum seekers and their families. DHS claims that it will likely process applications for employment authorization documents (EADs) as it did in the pre-*Rosario* timeframe, so if it eliminates the 30-day rule it should replace it with a 60-day rule.<sup>4</sup>

The stated purpose of the Proposed Rule is to "ensure USCIS has sufficient time to receive, screen, and process applications for an initial grant of employment authorization based on a pending asylum application," and DHS states that the "change will also reduce opportunities for

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<sup>3</sup> The *Rosario* class action refers to *Rosario v. U.S. Citizenship & Immigration Servs*, No. 2:15-cv-00813-JLR, a class action brought in U.S. District Court for the Western District of Washington, in which plaintiffs sought to compel USCIS to adjudicate asylum applicants' initial application for employment authorization within 30 days as required by the regulations. The agreed partial implementation plan was made part of the court decision that ordered USCIS to cease "failing to adhere to the 30-day deadline" and to submit status reports every six months to inform the court of its compliance rates. *Rosario v. U.S. Citizenship & Immigration Servs*, No. 2:15-cv-00813-JLR (W.D. Wash. July 26, 2018).

<sup>4</sup> The NPRM considers and rejects imposing a 90-day processing rule. DHS does not offer any explanation why, if it intends to complete most processing within 60 days, it is not able to commit to processing all EADs under the regulation within 90 days. (84 FR 47166).

fraud and protect the security-related processes undertaken for each EAD application.” (84 FR 47149). However, as DHS itself recognizes in the NPRM, the 30-day deadline in 8 C.F.R. § 208.7(a)(1) was initially implemented “to ensure that bona fide asylees are eligible to obtain employment authorization as quickly as possible.” (84 FR 47153 at FN 11 (citing 59 FR 14779-780)).

Moreover, the fraud and national security vetting procedures that DHS claims require the elimination of the processing deadline have been in place for more than a decade and, for more than a year, USCIS has been able to show substantial compliance with the *Rosario* agreed partial implementation plan. The elimination of this deadline not only significantly delays employment authorization but also fails to propose any timeline for adjudication.

Under INA § 208(d)(2), asylum seekers may not be granted an initial EAD until their asylum applications have been pending for 180 days. However, nothing prevents USCIS from accepting initial EAD applications concurrently with the filing of the asylum application. Indeed, prior to 1994, asylum seekers could apply for employment authorization at the same time as they filed for asylum. Returning to this system, now that the INA prohibits granting the EAD until 180 days have passed, would give USCIS sufficient time to perform vetting without unduly prejudicing the asylum seeker by delaying adjudication of the EAD.

In the NPRM, DHS itself has underlined numerous uncertainties as to the consequences of the drastic change it proposes. This lack of clarity adds an unpredictability that will increase hardship to asylum applicants, their families and their communities who bear the cost of being denied opportunities to work lawfully in the United States while their claims are being processed.

## **II. DISCUSSION**

### **a. The Proposed Rule Substantially Erodes the Rights of Asylum Seekers Without Proper Justification.**

Asylum applicants are, by definition, a vulnerable group of individuals who have fled their home countries due to threat of persecution. Upon arrival in the United States, asylum seekers may not have family, friends or community support on which to rely financially. The regulatory history of asylum reform is grounded in assisting bona fide asylum applicants to obtain their employment authorization as quickly as possible to encourage self-sufficiency, a necessary step towards their integration in U.S. society. As DHS recognizes in the NPRM, “one of the chief purposes” of the 30-day deadline was “to ensure that bona fide asylees are eligible to obtain employment authorization as quickly as possible.” 62 FR at 10318 (March 6, 1997). The Proposed Rule is contrary to a basic principle of United States immigration law since its earliest immigration statutes: self-sufficiency as stated in §1601 of Title 8 of the US Code. Self-sufficiency starts with promptly providing bona fide asylum applicants with employment authorization within the processing time prescribed in the regulations.

DHS states in the NPRM that it believes that the “30-day timeframe is outdated, [and] does not account for the current volume of applications....” DHS underscores that, as of March 12,

2018, the affirmative asylum backlog stood at 317,395 applications and has been growing for several years. However, in 1994, in the NPRM relating to Rules and Procedures for Adjudication of Applications for Asylum or Withholding of Deportation and for Employment Authorization, the Justice Department, through the former Immigration and Naturalization Service (INS), similarly stated that “the existing system for adjudicating asylum claims cannot keep pace with incoming applications...” (59 FR 14770, March 30, 1994, at 14780). The Justice Department noted that “[o]n October 1, 1990 the INS had a backlog of approximately 90,000 asylum claims. Since that date, approximately 250,000 cases have been added to that backlog.” Therefore, in 1994, the Department had accumulated a backlog of up to 340,000 asylum applications – higher than the amount reported in the NPRM. And yet even within that context, the Justice Department decided to promulgate the current rule requiring prompt adjudication of applications for employment authorization within 30 days of their receipt, and consistent with the statute. Moreover, DHS *has* been able to comply fairly with the Rosario mandate of processing employment authorization applications within the 30-day time frame which it now seeks to remove without any satisfactory justification.

**b. The Proposed Rule Inflicts Uncalculated Costs on Asylum Seekers, Their Families, and Communities.**

***i. Costs on Asylum Seekers***

The Rule would cause significant financial hardship to asylum applicants who are otherwise unable to work and to those who depend on them financially—destabilizing the financial situation of persons already traumatized by the threats and persecution that led them to apply for asylum.

Without an EAD and access to lawful employment, many asylum-seekers will have difficulty accessing drivers’ licenses, banking services, adequate housing, and healthcare. This, in turn, will lead to increased rates among asylum seekers and their families of homelessness, hunger, and the use of emergency services and hospital emergency rooms as a primary source of health care, leading to delayed treatment of health conditions and overall worse health outcomes for themselves and for the general public. It will also lead to reduced educational attainment and overall productivity among asylum seekers and their families. Furthermore, without an EAD and access to lawful employment, asylum seekers will most certainly be forced into unauthorized employment as a way to survive, placing them at greater risk of exploitation and abuse by unscrupulous employers.

Without the ability to lawfully earn income, asylum seekers will be unable to afford legal counsel to help them prepare and prosecute their asylum applications. Asylum seekers who cannot afford legal counsel are significantly less likely to win relief. Nationwide, asylum seekers are approximately four times more likely to prevail on their claims with legal representation than



without.<sup>5</sup> Because asylum seekers are not entitled to publicly-funded counsel, the Proposed Rule has a direct effect on whether asylum seekers are able to successfully obtain status.

## ***ii. Costs on Businesses***

The NPRM acknowledges the current low unemployment rate in the United States and the risk that businesses may not find reasonable substitutes for labor as a result of the Proposed Rule, resulting in a cost for companies. The NPRM admits that the lost compensation due to the processing delays could range from \$255.88 million to \$774.76 million as it will generate lost productivity and profits for businesses. (84 FR 47150). Additionally, DHS itself recognizes that the Proposed Rule is being introduced without adequate study of the alternatives, including the costs of hiring additional officers to adjudicate the EAD applications (84 FR 47149), or the full costs to US businesses that will be unable to hire the most qualified workers for their open positions (84 FR 47150-151). This lost compensation will, in turn, lead to loss of tax revenue to local and state governments, and to the federal government. DHS itself estimates that the *annual* Medicare and social security revenue loss to the government to be between \$39.15 and \$118.54 million. (84 FR 47157).

## ***iii. Costs on Communities and Service Providers***

Less than a month after the Final Rule on the public charge ground of inadmissibility was published in the Federal Register of August 14, 2019 (Vol. 84, No. 157), which discourages immigrants to avail themselves of public benefits to which they are entitled, DHS is now attempting to make it more difficult for asylum applicants to obtain an EAD, which would allow them to become self-sufficient. Congress states in US Code, Title 8, §1601 that: “(...) (1) Self-sufficiency has been a basic principle of United States immigration law since this country’s earliest immigration statutes,” which begs the question of how asylum seekers can be expected to become self-sufficient without timely approvals of their EADs. DHS acknowledges in the NPRM that “[a]ny delay beyond the regulatory 30-day timeframe would prevent an EAD applicant, if his or her applicant were approved, from earning wages and other benefits until authorization is obtained” (84 FR 47163), but it does not address how asylum seekers are then expected to financially survive without an EAD until their application is approved. The Proposed Rule would burden and stretch the capacity of charities and non-profit service providers if asylum-seekers are unable to obtain an EAD in a timely manner. Under such circumstances, asylum seekers would have no alternative than to rely on other forms of support (i.e. financial, housing, legal, etc.) administered at the local, state, and federal level.

## **c. Removal of the Deadline Without Replacing It with Any Other Deadline Creates Uncertainty and Unpredictability**

The Proposed Rule would eliminate the 30-day processing deadline without replacing it with any other time frame and without any guarantee for the reasonable and timely adjudication

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<sup>5</sup> See, Human Rights First, *Fact Sheet: Central Americans were Increasingly Winning Asylum Before President Trump Took Office*, (Jan. 2019), [https://www.humanrightsfirst.org/sites/default/files/Asylum\\_Grant\\_Rates.pdf](https://www.humanrightsfirst.org/sites/default/files/Asylum_Grant_Rates.pdf). (All links cited in this letter were last visited on November 6, 2019.)



of asylum applicants' initial employment authorization applications. It is essential that a processing deadline be incorporated in the adjudication of applications for employment authorization.

In February 2016, the City Bar submitted comments opposing the repeal of former 8 C.F.R. § 274a.13(d), which guaranteed the adjudication of employment authorization applications for most immigrant and nonimmigrant categories within 90 days.<sup>6</sup> Notwithstanding broad opposition to the rule change, the Service implemented the rule, and substituted it with an inadequate automatic 180-day extension on timely filed renewal applications for some categories (including pending asylum applications). *See* 8 C.F.R. § 274a.13(d)(1). Yet, the lack of any processing deadline on initial applications has caused significant disruption in the lives of immigrants and nonimmigrants subject to the changed rule which, as of January 2017, has resulted in interrupted employment and associated lost income and benefits, lost business opportunities for workers and their employers, and suspended driver licenses, among other problems. In the NPRM, DHS claims that the Proposed Rule to remove the 30-day processing deadline on initial asylum EADs is motivated by bringing these adjudications in line with the other categories. However, for the same reasons the City Bar opposed the 2017 rule change, we oppose this change as well: without a clear processing deadline, asylum seekers and their families are faced with uncertainty as to whether they will be able to support themselves, and this unpredictability will severely impact them and their communities.

### III. CONCLUSION

Based on the foregoing, the City Bar respectfully opposes the removal of the 30-day processing provision for Asylum Applicant-Related Form I-765 Employment Authorization Card Applications. In light of the lack of proper justification for the rule change, combined with the deleterious effects such rule change will have on asylum seekers, their families and communities as well as associated negative impacts on businesses, service providers, and public health, the Proposed Rule can only be viewed as part of a larger effort on behalf of this administration to delay, derail, and discourage asylum seekers from seeking safety in the United States and obtaining benefits as a matter of right under asylum law.

Respectfully,



Victoria F. Neilson, Chair  
Immigration & Nationality Law Committee

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<sup>6</sup> New York City Bar, Comments opposing proposal to repeal 8 C.F.R. § 274a.13(d) providing that USCIS must adjudicate employment authorization applications within 90 days, or in the alternative issue interim employment authorization document, (February 29, 2016), <https://www.nycbar.org/member-and-career-services/committees/reports-listing/reports/detail/comment-opposing-proposed-rule-eliminating-the-requirement-that-uscis-adjudicate-an-application-for-employment-authorization-within-90-days-of-the-application>.

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-mn1c <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0963

Comment Submitted by HD Sumner

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## Submitter Information

**Name:** HD Sumner

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## General Comment

Stop this mindless destruction of our once great nation.

AR002627

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0964

Comment Submitted by Jeanine Kincheloe

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## Submitter Information

**Name:** Jeanine Kincheloe

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## General Comment

Existing law is here for the purpose of protecting the Unalienable Rights of the citizens. No one has a right to enter this country without being able to support themselves, provide their own funds to participate in education, healthcare, transportation or any other requirement of life. President Trump has full authority, given in 1952 Immigration Law to do as he sees fit. Not only do we need to cut legal immigration down to a bare minimum of 150,000/year, but each person must take an oath to the Constitution, Pray to God, Provide their own financial support, and have superior skills that help elevate the number of inventions and innovations that this country achieves. They must not be muslims following the Quran or Sharia Law. They must not be criminals. Those two things should not even have to be stated, but here we are, in nonsense land where our own government sees no reason to protect our own land, our own borders, our own citizens, our own freedom, our own founding documents, founding history. This country must return to God and that does NOT mean turning this country over to demonic marxists, gangbangers, murderers, disease carrying misfits from shithole countries. I have pride in this country and so does our honorably elected, anointed and appointed Donald John Trump. I support everything he does as long as nothing diminishes my unalienable rights to pray, live, teach, speak, worship and speak the truth as given not only by our founders but by God Almighty. Bring back the honest understanding of our founders and our history and our documents and return us to our roots.

AR002628

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0965

Comment Submitted by Ron Howell

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## Submitter Information

**Name:** ron howell

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## General Comment

we voted trump in....do whats right for a change...for the country's sake do the right thing for a change.

AR002629

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0966

Comment Submitted by Jacinta Gage

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## Submitter Information

**Name:** Jacinta Gage

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## General Comment

Putting a timeline on screening immigrants at a time when there is SO much danger to our safety and those coming in are at an all time high is the height of STUPIDITY!!!! Don't think the American citizens can't see through this!!! I urge you to remove this arbitrary bureaucratic time line and secure the safety of our country!

AR002630

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0967

Comment Submitted by Mark Clement

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## Submitter Information

**Name:** Mark Clement

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## General Comment

Do the right thing and support President Trumps Immigration reforms. We're tired of the partisan politics that jeopardize our safety as American citizens. If you don't do this we will rise up and replace you all.

AR002631

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0968

Comment Submitted by Gary Smith

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## Submitter Information

**Name:** Gary Smith

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## General Comment

We, the people, are in need of real immigration reform. Citizens of this great country now live in greater fear of unprovoked assault. The impact of an unprotected southern border effect every taxpayer in the USA.

AR002632

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0969

Comment Submitted by Dot Parrish

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## Submitter Information

**Name:** Dot Parrish

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## General Comment

Stricter immigration laws

AR002633



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0970

Comment Submitted by Jeanne Nixon

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## Submitter Information

**Name:** Jeanne Nixon

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## General Comment

I'd like to tell you to please support President Trump's immigration reforms. Thank you so much!!

AR002634

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0971

Comment Submitted by Ronald Brunk

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## Submitter Information

**Name:** Ronald BRUNK

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## General Comment

Document them all, no criminals or traffickers. And if you gain legal admittance to this country, get a job and support yourself, no WIC, EBT or Medicare. Also, you should not get the privilege to vote for at least 2 elections cycles, as you have no idea what or whom you're voting for. By the way, raise the voting age for all to at least 22, after you're working and paying taxes. maybe by that time you can understand where the \$\$ comes from.

AR002635

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0972

Comment Submitted by Tom Stanzione

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## Submitter Information

**Name:** Tom Stanzione

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## General Comment

We must create and preserve a safe and secure America for ourselves and our families. Not allowing adequate time and resources to maintain a secure border and carefully examine all those who seek to enter our country is a certain sign that those people do not love this country as we do. I am begging that you support the necessary changes that will fully secure our country and insure all those who seek to come here are of honest, sincere needs or desires and are fully vetted no matter what that takes.

AR002636

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0973

Comment Submitted by Virginia O'Donnell

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## Submitter Information

**Name:** Virginia O'Donnell

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## General Comment

Do this before more innocent lives are taken.

AR002637

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0974

Comment Submitted by Virginia Lange

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## Submitter Information

**Name:** Virginia lange

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## General Comment

Immigration reform. needs to happen now before we succumb to the lawless actions of illegals and put our safety in jeopardy . Its way passed time to do this!!!

AR002638

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0975

Comment Submitted by Louise Wilhelmy

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## Submitter Information

**Name:** Louise Wilhelmy

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## General Comment

Stop hindering please support President Trump immigration reform

AR002639

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-z5ht <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

## Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

## Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0976

Comment Submitted by David Cole

## Submitter Information

**Name:** David Cole

## General Comment

It's time for the BS to stop, our borders need to be secured, our immigration system needs to be protected

How many more Americans have to die is before Democrats get it.

I was a Democrat, the Democrat Party is went so far to the left I can no longer have anything to do with it.

Please, for the sake of our children and our children's children this must be taken care of now.

I cannot believe that stupidity that comes out of Washington, President Trump is more than willing to fix our immigration system if he just had a little help from the far-left Looney Tunes that have taking over our government. I could care less about his Tweets big mouth, he gets the job done.

AR002640

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-ocx9 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0977

Comment Submitted by Sue Chacon

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## Submitter Information

**Name:** sue chacon

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## General Comment

we the people want you to support the Presidents immigration reforms

AR002641



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-uvjj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0978

Comment Submitted by Carolyn Musick

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## Submitter Information

**Name:** Carolyn Musick

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## General Comment

Please support President Trump's immigration reforms for the safety of our country.

We now have Muslim radicals in our Congress. What next a Muslim president who will try to enforce their beliefs on all of us?

Wake up Congress and citizens of the United States!!!!!!

AR002642

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-ow4q
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0979

Comment Submitted by Benjamin Talmadge

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## Submitter Information

**Name:** Benjamin Talmadge

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## General Comment

All you folks in Washington you know who I am talking to Democrats and liberals and socialist party start supporting President Trumps immigrant reform we dont need to have millions of illegals getting free stuff that aint free we Americans have to work for them NO WAY. Keep them out. Let ice and DHS do their job

AR002643

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-frj2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0980

Comment Submitted by Chester Vidacovich

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## Submitter Information

**Name:** Chester Vidacovich

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## General Comment

Give our immigration services time to determine if an illegal alien is or is not a threat to our country and the people in it. It is way pass time to help citizens instead of illegal aliens.

AR002644

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-hjuk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0981

Comment Submitted by Kathy Harris

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## Submitter Information

**Name:** Kathy Harris

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## General Comment

Please Please Please!! Support our President in the immigration reform. Stand with the President and you may be re-elected!

AR002645

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-2t9z
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0982

Comment Submitted by Orpha Henderson

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## Submitter Information

**Name:** Orpha Henderson

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## General Comment

Keep America free and safe lets stand. Behind our PRESIDENT!

AR002646

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-tlw8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0983

Comment Submitted by David Lawrence

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## Submitter Information

**Name:** David lawrence

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## General Comment

Your job is to support president trumps immigration reforms!!

AR002647

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-gr5n
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0984

Comment Submitted by Linda Turley

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## Submitter Information

**Name:** linda turley

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## General Comment

pls support President Trump's immigration reforms.

AR002648

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-my5e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0985

Comment Submitted by Cheryl Cotton

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## Submitter Information

**Name:** Cheryl Cotton

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## General Comment

If your purpose is to protect the citizens of this country and to assist the aliens who are legally coming through the system for admittance into America, I am convinced without a doubt that you will voluntarily and immediately change the 30 day requirement for background checks. Our system is flooded right now and this timeline insures critical and deadly errors will be made. If this is not your purpose, the citizens of America and the Country is at grave risk. Please consider this and act for the country and its people.

AR002649



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-fua6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0986

Comment Submitted by Leila Freijy

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## Submitter Information

**Name:** Leila Freijy

**Address:**

Law Office of Leila Freijy PLLC

3150 Livernois Road, Suite 103

Troy, MI, 48083

**Email:** leila@freijylaw.com

**Phone:** 248-817-8280

**Fax:** 248-287-4115

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## General Comment

Once the USCIS removed the 90-day processing requirement for other EAD categories, processing times have been up to 8 months or even longer in many cases. While some categories permit for a 180-day grace period to continue working beyond the expiration date of an existing EAD if a renewal application is pending, there are only a very few categories that permit this and with processing times of 8 months or more this can still leave people without work, which hurts them, their families and the U.S. employers for whom they work. For people applying for a first time EAD, the longer the processing time, the longer it takes them to be able to start working.

The I-765 application is a relatively simple application. It's unclear to me why the USCIS cannot continue to process this within 90-days, or 30-days for asylum applicants, as they have been doing for years.

This is just one more attempt at trying to discourage immigrants from coming to the U.S. or trying to disadvantage them once they have arrived, often after risking both life and treasure in the process. Despite that, most immigrants

AR002650

want to work.

They want to support themselves and their families, and with an unemployment rate of under 4%, U.S. businesses want them to be able to work as well.

Finally, many communities in the U.S., including some in Michigan, are actively recruiting new immigrants to their neighborhoods as these States and communities recognize that new immigrants, with their strong work ethic and family values, can turn around disadvantaged neighborhoods and make them safe and prosperous again. In Michigan, Bangladeshi and Yemeni immigrants are largely credited with turning around the city of Hamtramck, which was failing and becoming unsafe. Michigan has also been encouraging new immigrants to come to Pontiac, another city that has been failing for decades.

The U.S. doesn't want immigrants to become a burden on the U.S. and yet the USCIS is suddenly unwilling or unable to process their EAD applications within 30-days despite having done so for years. New immigrants to the U.S. want to work. There is no reason that the USCIS cannot continue to process these applications within 30-days. We have already seen what happened when the 90-day processing requirement was lifted for other EAD categories - processing times of 8 months or even longer in some cases with no recourse.

AR002651

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-r6n5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0987

Comment Submitted by Larry Lanier

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## Submitter Information

**Name:** Larry Lanier

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## General Comment

We are living in an uncertain society in which individuals who are opposed to our freedom are being allowed into our country. We need to take steps to insure that anyone receiving permission to enter our country has been fully vetted. The restrictions on vetting being imposed by the time limits are allowing questionable persons to enter and stay in our country. Please remove the time restrictions and secure our country.

AR002652

# PUBLIC SUBMISSION

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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-cfxe
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0988

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am in shock and in total sadness with this proposal. The question i will like to ask is what do the Administration stand to gain with such regulation or law and if they think they are going to benefit something, permit me say it will be on the contrary if these goes into effect.

Asylum seekers with EAD are less likely to get themselves involved into crimes or breaking the law. Simply because with their EAD, they can work and support themselves, secondly, their jobs keeps them busy and focus hence making them better integrate in the society.

Think about the taxes they pay to the states when they are authorized to work, think of the labor force they bring to the economy which is lacking behind when they are allow to work. All these are reasons why i cannot stress enough that this regulation is going to hurts more than it heals and that is simply un-American.

In fact the best thing to do is to get asylum seekers EAD 2 weeks after application, beside there is no crime in working and supporting yourself

AR002653

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-a7n6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0989

Comment Submitted by Sandy Jugenheimer

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## Submitter Information

**Name:** Sandy Jugenheimer

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## General Comment

We must check everyone out with no timeline.

AR002654

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-6kjb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0990

Comment Submitted by Barry Lynn

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## Submitter Information

**Name:** Barry Lynn

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## General Comment

Stop giving President Trump a hard time on everything that hes doing really good for our country especially immigrations protect our borders and give him the tools that he needs to work!

AR002655

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-rlly
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0991

Comment Submitted by Carol Carni

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## Submitter Information

**Name:** Carol Carni

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## General Comment

Support President Trumps immigration reform! This must be taken care of immediately! Time is short! Take action NOW!!!

AR002656

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-5f2h <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0992

Comment Submitted by Jack Hauer

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## Submitter Information

**Name:** Jack Hauer

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## General Comment

Please support President Trump's Immigration reforms and extend the time frame for checking immigrant backgrounds to a more reasonable level.

AR002657



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-3978
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0993

Comment Submitted by Steve Boshoff

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## Submitter Information

**Name:** Steve Boshoff

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## General Comment

Secure our boarder's

AR002658

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0994

Comment Submitted by Mark Squire

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## Submitter Information

**Name:** Mark Squire

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## General Comment

Please support president Trumps immigration reform AND build our border wall, NOW!

AR002659

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0995

Comment Submitted by Robert Ready

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## Submitter Information

**Name:** Robert Ready

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## General Comment

President Trumps immigration reforms are absolutely critical to America. These reforms are overdue and they are critical to establishing common sense immigration laws and policies that create safe logical passage for immigrants coming to America. I implore you to support President Trumps immigration reforms.

AR002660

# PUBLIC SUBMISSION

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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-fsb9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0996

Comment Submitted by Jeffrey Mackenzie

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## Submitter Information

**Name:** jeffrey mackenzie

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## General Comment

I urge you to support President Trumps immigration reforms. We need to protect the rights of our citizens and those who have entered our country LEGALLY.

AR002661

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-dgo0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0997

Comment Submitted by Linda Karmann

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## Submitter Information

**Name:** Linda Karmann

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## General Comment

As a citizen and wife of veteran I find our immigration laws a joke. People who have come legally have a right to be upset at this injustice.

AR002662

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-woid
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0998

Comment Submitted by Marie Flatt

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## Submitter Information

**Name:** MARIE FLATT

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## General Comment

Our country's citizens expect our elected officials to uphold our constitution and the safety that it provides us. We finally have a president that is serious about his sworn commitment to do so. Please support him in his lawful responsibility to screen out threats to our national and individual security.

AR002663

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-qku6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-0999

Comment Submitted by A Border

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## Submitter Information

**Name:** A Border

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## General Comment

I think we should let the socialists move to California and then build our wall between California and the US. That way they can have the socialism and we can keep our freedom!

AR002664

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-tloz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1000

Comment Submitted by Samson Boganim

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## Submitter Information

**Name:** samson boganim

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## General Comment

The Trump Administration need enough time to thoroughly check the background of every asylum seeker for the safty and security of our country.

AR002665



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-wrhx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1001

Comment Submitted by John Coleman

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## Submitter Information

**Name:** John Coleman

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## General Comment

Our President has been attempting to protect our borders and and to properly vet immigrants. I feel that he has been obstructed by those who have a different direction for our country. I sincerely wish that our elected representatives do more than provide lip service and actively get behind the initiatives that we voted for.

AR002666

# PUBLIC SUBMISSION

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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-kbwt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1002

Comment Submitted by Ruth Gronostaj

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## Submitter Information

**Name:** Ruth Gronostaj

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## General Comment

Washington needs to start backing President Trump and hid policies, and quit playing your petty and mindless, politics. Do your jobs and remember that you work for the citizens of ther USA!

AR002667

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-n9u0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1003

Comment Submitted by Mary Close

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## Submitter Information

**Name:** Mary close

---

## General Comment

The safety of our country should come first do your job the laws are there stop fighting Trump for doing whats right for the country your country is never been in such horrible shape because of all this bickering going back-and-forth its time to do the right thing forget your freaking little agendas because I was youre doing is ruining our country by not doing your job

AR002668

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-1yug <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1004

Comment Submitted by George Bryant

---

## Submitter Information

**Name:** George Bryant

---

## General Comment

I support president Trumps immigration reforms 100 percent!

AR002669

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-ipm2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1005

Comment Submitted by Bruce Romine

---

## Submitter Information

**Name:** Bruce Romine

---

## General Comment

To whom it may concern this is a note from a conserved citizen because our present system isnt allowing enough time to properly vet individuals coming into our. That needs to be changed so that criminals or undesirables are not allowed into our country as is shown by the news from day to day enough of them have reached our shores and that must stop. We need to time limit in this endeavor, thanks

AR002670

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-ifj9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1006

Comment Submitted by Daryl Lawrence

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## Submitter Information

**Name:** Daryl Lawrence

---

## General Comment

This forces bureaucrats to cut corners on background checks and divert valuable resources away from immigrants who are playing by the rules. Thats INSANE!

The Left is supporting a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline. This has to change and it must!

SUPPORT President Trump's Immigration Policies,

AR002671

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-ndq1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1007

Comment Submitted by Dave Page

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## Submitter Information

**Name:** Dave Page

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## General Comment

I want our borders CLOSED completely!!!! We need to stop all drug traffic and the wall is only a start. Complete vetting of any immigrant should be done before said immigrant sets foot on our soil. No more anchor babies! No more 3rd world terrorists disguised as asylum seekers. TRUMP IS RIGHT in order to MAGA, immigration must be halted until we can secure our borders

AR002672

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-651f
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1008

Comment Submitted by Bryan van Deun

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## Submitter Information

**Name:** BRYAN VAN DEUN

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## General Comment

Our immigration system is broken. Our duly ELECTED administration needs time to reform it. Do not force rapid, ineffective changes but let the evaluation proceed until a balanced system is created.

AR002673



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-tx5k <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1009

Comment Submitted by Harold Blood

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## Submitter Information

**Name:** HAROLD BLOOD

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## General Comment

IT IS TIME TO EXTEND THIS TIME TO 90 DAYS OR SIX MONTHS

AR002674

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-f5ib
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1010

Comment Submitted by James Moyer

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## Submitter Information

**Name:** James moyer

---

## General Comment

Illegal imigration under obummer was and is illegal and not responsable to the citizens of the U.S. communism is not what we the people want or expect of the BSleader ship in congress and senate, you work for us not we are servants for your curruption of America

AR002675

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-wrjq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1011

Comment Submitted by Charles White

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## Submitter Information

**Name:** Charles white

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## General Comment

Please support presidents trumps immigration l please support presidents trumps immigration reforms .

AR002676

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-swgh <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1012

Comment Submitted by Kathleen Eastridge

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## Submitter Information

**Name:** Kathleen Eastridge

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## General Comment

I am behind President Trump 100 percent!!!!!! I support this please make my vote count!

AR002677

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-iypq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1013

Comment Submitted by Demetrios Vagalatos

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## Submitter Information

**Name:** Demetrios Vagalatos

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## General Comment

Our country is less safe today because of arbitrary bureaucratic timelines. Support our President's Immigration Reforms.

Do not let the Liberals ruin our country!

AR002678

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-5jvu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1014

Comment Submitted by Todd Regina

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## Submitter Information

**Name:** Todd Regina

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## General Comment

Please allow President Trump and the other law enforcement agencies enough time to thoroughly get those seeking asylum here. Not only is it the constitutionally correct thing to do but it's also a matter of morality for our citizens.

AR002679

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-ib4n <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1015

Comment Submitted by Jerald Cody

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## Submitter Information

**Name:** Jerald Cody

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## General Comment

Give the Trump administration enough time to check the background of every illegal alien..

AR002680

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-o8rl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1016

Comment Submitted by Debra Chapman

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## Submitter Information

**Name:** Debra Chapman

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## General Comment

What the heck are you doing??!!! Letting the Democrats getting away with illegal and unconstitutional power and control. They are not the choice of the USA. They are only one Party of it. Would you please Stand Up for the people and let OUR voices be heard!!!!

AR002681



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-ib2m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1017

Comment Submitted by Gail Daley

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## Submitter Information

**Name:** Gail Daley

---

## General Comment

The Trump Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

This forces bureaucrats to cut corners on background checks and divert valuable resources away from LEGAL immigrants who are playing by the rules.

Just by the sheer amount of illegals crossing our borders this is an impossible task and reforms are necessary, so Please Support President Trump's Immigration Reforms!!!

AR002682

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-qdmk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1018

Comment Submitted by Rita LeSage

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## Submitter Information

**Name:** Rita LeSage

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## General Comment

Please stop impeding the U. S. people the safety they deserve. You are making unrealistic timelines. Everyone needs to be vetted. I am not against someone trying for a better life but there needs to be a process to all of it. Stop making it worse!!! Do your jobs and get over all the crap out there.

AR002683

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-d3kf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1019

Comment Submitted by Summer S

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## Submitter Information

**Name:** Summer S

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## General Comment

See attached file(s).

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## Attachments

8 CFR Part 208 Comment

AR002684

November 6, 2019

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S.C.I.S., D.H.S.  
20 Massachusetts Avenue NW  
Mailstop #2140,  
Washington, DC 20529-2140

Dear Ms. Deshommes:

This letter is in response to the notice of proposed rulemaking, Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, CIS No. 2617-18; DHS Docket No. USCIS-2018-0001 (“Proposed Rule”). I respectfully request that the Proposed Rule be withdrawn or modified to reflect the current thirty-day (30) requirement, as dictated in the *Rosario v. USCIS* court order.<sup>1</sup> As it stands, the Proposed Rule has significant implications for Asylum Applicants (“Applicants”) and federal resources.

*A. Implications for Applicants*

United States Citizenship and Immigration Services (“USCIS”) failed to consider any negative implications for Applicants. While Applicants are waiting for their asylum case to be adjudicated, they are barred from lawfully working unless they are granted Employment Authorization Documents (“EAD”). By increasing the amount of time USCIS must adjudicate applications for EAD by thirty (30) days, USCIS is prohibiting Applicants from feeding, clothing, and sheltering themselves and their children. Although Applicants must have a sponsor in the United States while their asylum claim is processed, further hampering their ability to work is an attack on the Applicants.

*B. Waste of Federal Resources*

USCIS cites that approximately 78% of applications for EAD were adjudicated within sixty (60) days.<sup>2</sup> Even if this statistic is true, that does not indicate that the rule should be changed to reflect the status quo. The individuals processing the EADs would have no incentive to swiftly adjudicate. Additionally, every day past the thirty (30) day deadline is a day that the Applicant must depend on outside resources for income, and a day that USCIS must spend on the EAD adjudication.

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<sup>1</sup> *Rosario v. USCIS*, No. 2:15-cv-00813-JLR (W.D. Wash. 2017), *appeal pending*, *NWIRP v. USCIS*, No. 18-35806 (9th Cir.) (holding that USCIS must adjudicate applications for employment authorization documents within thirty days).

<sup>2</sup> Proposed Rule.

### *C. Other Comments*

USCIS continuously cites the “backlog” of Applicants as a reason for the Proposed Rule. If anything, this “backlog” would warrant an expedited process and a continuation of resource allocation to the adjudication of asylum claims and EAD. However, USCIS claims that it does not want to continue allocating resources to this process, and that the current system is unsustainable. Despite the need for “sustainability,” USCIS admits that it did not calculate the hiring cost of new employees to help adjudicate asylum claims and EAD to meet the thirty (30) day goal set forth by *Rosario*.<sup>3</sup> Instead, it would rather forgo the research into any alternatives and bypass precedent. USCIS would rather utilize the same resources stretch across a longer time frame. Further, it argues that the cost of hiring and training employees to adjudicate EADs would be passed onto asylum seekers, in the form of lost wages and higher application fees. However, USCIS offers no direct evidence of these transferred costs. It merely points to an accounting statement by the Office of Management and Budget for 2017 to predict possible costs for 2019-2028. Moreover, USCIS has failed to quantify benefits of the Proposed Rule to USCIS and DHS despite citing the qualitative benefits as “long-term sustainability.”<sup>4</sup>

At a minimum, the lack of study leading to and cited by the Proposed Rule calls for further research. Absent further research, the true purpose of the Proposed Rule is not to alleviate burdens on USCIS, but rather to implement a stranglehold on Asylum Applicants, consistent with the Executive Branch’s immigration policy. Therefore, the Proposed Rule must be withdrawn or modified in consideration of this comment.

Sincerely,

Concerned Citizen

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<sup>3</sup> *Rosario v. USCIS*, No. 2:15-cv-00813-JLR

<sup>4</sup> Proposed Rule.

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-anb4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1020

Comment Submitted by John Miller

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## Submitter Information

**Name:** John Miller

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## General Comment

Immigrants and asylum seekers need to be fully vetted prior to entry into the United States. Remove time limits for this process.

AR002687

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-ydyr <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1021

Comment Submitted by Steve Wilson

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## Submitter Information

**Name:** steve wilson

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## General Comment

Remove time limits to allow a thorough background check for asylum seekers 30 days is not enough, it should be as long as it takes.

AR002688

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-ce66
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1022

Comment Submitted by Delfred Cone

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## Submitter Information

**Name:** Delfred Cone

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## General Comment

Immigration is fine as long as the people really want to become Citizens of the United States and are governed by our laws . I believe background checks are a needed requirement . Our Country was started by immigrants from many other countries.

AR002689



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-9fcu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1023

Comment Submitted by Shelley Grafmyre

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## Submitter Information

**Name:** Shelley Grafmyre

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## General Comment

We need an easier method of vetting those who cross our borders NOW! Support President Trumps immigration reforms. We should not have dangerous criminals and gang members coming into this country. YOU can stop it!

AR002690

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-1j pz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1024

Comment Submitted by James Brandenburg

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## Submitter Information

**Name:** James Brandenburg

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## General Comment

We must reform immigration system. Our country should stop any immigration at this time till we come up w/a resolution. Making sure all Americans are safe and secure, during the changing times. Must respect the USA flag and American culture.

AR002691

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-zul5 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1025

Comment Submitted by Wm Weber

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## Submitter Information

**Name:** Wm Weber

---

## General Comment

Until we clean up our cities, and remove the homeless there is no room or the funds to support those wanting to enter the USA. If it were available there are not enough funds to support them now or ever. Seniors in America have continually been abused and overlooked consistently.

Add our veterans, who are neglected on a daily basis by those who have an agenda of self serving for their own benefit.

Presently due to the political war in America is stopped and the waste is under control, no one should be allowed In the United States of America.

AR002692

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-y9u2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1026

Comment Submitted by Margaret Koch

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## Submitter Information

**Name:** Margaret Koch

---

## General Comment

In light of the recent slaughter of the family in Mexico by the drug cartels it doesn't take a genius to aggressively step up to the plate and Support Pres. Trumps immigration proposals. How many citizens within or outside American borders must lose their lives before Congress does it's job in protecting this nation. To set a deadline on vetting illegal aliens ir so called asylum seekers entering our nation is insanity

AR002693

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-d85a <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1027

Comment Submitted by Richard Bellard

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## Submitter Information

**Name:** Richard Bellard

---

## General Comment

Please help President Trump build the wall where it will help stop or slow illegal immigration.

AR002694

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-y6lt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1028

Comment Submitted by Kathleen Morison

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## Submitter Information

**Name:** Kathleen Morison

---

## General Comment

It is so very important that we all support Trump in securing our borders against the evil and corrupt individuals coming into our country causing harm and death. We Must Support President Trumps immigration reform!!!!

AR002695

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-yvwx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1029

Comment Submitted by Elizabeth Dunphy

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## Submitter Information

**Name:** Elizabeth Dunphy

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## General Comment

Please back President Trumps efforts to keep Us safe!

AR002696

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-6k7i
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1030

Comment Submitted by Mike Reeves

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## Submitter Information

**Name:** Mike Reeves

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## General Comment

No reasonable American is opposed to Immigration. We want and need immigrants! But they must contribute to society, not draw from it. We need to screen them efficiently, require a sponsor, and require they have income or employment. America is great because of immigration. Please reform to process and manage the process. ILLEGAL IMMIGRATION IS WRONG!

AR002697



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-i9d5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1031

Comment Submitted by Don Tobias

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## Submitter Information

**Name:** Don Tobias

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## General Comment

DAMMIT! Get on the stick, and PASS PRRSIDENT TRUMPS IMMEGRATION REFORMS!!!!  
Worthless dann Congress!

AR002698

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-ixuv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1032

Comment Submitted by Francis Matanza

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## Submitter Information

**Name:** Francis Matanza

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## General Comment

I would just like to lend my voice on the importance making sure that we have all the information about who we allow into this country no matter where they are from. It is a very serious matter for the security of my loved ones and the economic standpoint of this great united states as it stands and the effect that some of these cornera cut in background checks ect. will the stability and security of our country thank you for your time and patience

AR002699

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-rfz6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1033

Comment Submitted by Carol Hawkins

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## Submitter Information

**Name:** Carol Hawkins

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## General Comment

Support President Trumps Immigration Reforms! Stops fighting against him and support him like you should. Do it for our safety.

AR002700

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-cgmw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1034

Comment Submitted by Glenn Leyrer

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## Submitter Information

**Name:** Glenn Leyrer

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## General Comment

Stop the illegal immigration with ridiculous arbitrary deadlines to review cases. If you insist on these timelines, require applicants to wait outside of the U.S.

AR002701

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5s-ct01
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1035

Comment Submitted by Thomas Hammer

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## Submitter Information

**Name:** Thomas Hammer

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## General Comment

I sponsored a family of four from Russia in 1999. It took two years to bring them here going "by the book". It cost \$20k. I gave the father a job. The family lived in our house until they accumulated enough \$\$ to live on their own. This is the way it must be done.

AR002702

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-nhqp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1036

Comment Submitted by Mary Ann

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## Submitter Information

**Name:** Mary Ann

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## General Comment

Protect America!

AR002703

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-37qm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1037

Comment Submitted by Nyameche Quansah

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## Submitter Information

**Name:** Nyameche Quansah

**Address:**

4432 N Ravenswood Ave

2nd Floor

Chicago, IL, 60640

**Email:** wednesdayq@jane-addams.org

**Phone:** 7737517109

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## General Comment

My name is Nyameche Quansah, and I coordinate an adult education program in Chicago, IL. Removing the 30-day processing provision for asylum seeker work authorization would be severely detrimental to asylum seekers. Finding work is one of the most important and most stabilizing things that can happen for an asylum seeker. It's crucial that we help asylum seekers find work that they are qualified for as quickly as possible. If asylum seekers can't work they face homelessness, hunger and instability that adds to the trauma they have already experienced in having to feel their homelands. Asylum seekers just want to become contributing members of society in their new home. We need to be as welcoming as possible instead of putting obstacles into the paths of asylum seekers. Please keep the work authorization process for asylum seekers quick and predictable. Please do not change this rule.

AR002704

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-qttj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1038

Comment Submitted by Michael Damiani

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## Submitter Information

**Name:** Michael Damiani

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## General Comment

Do whatever Trump wants! to keep us safe!

AR002705



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5s-uf2b <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1039

Comment Submitted by Stephen Ambush

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## Submitter Information

**Name:** Stephen Ambush

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## General Comment

Please support the president's immigration policies.  
Thank you

AR002706

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-pihf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1040

Comment Submitted by Melissa Smith

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## Submitter Information

**Name:** Melissa Smith

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## General Comment

Please support President Trump's immigration reform. Help keep our country safe.

AR002707

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-k8dx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1041

Comment Submitted by Margaret Quiring

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## Submitter Information

**Name:** MARGARET QUIRING

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## General Comment

STOP THESE DEMOCRATS FROM THIS TIMELINE ON OUR WALL. WE NEED CHANGES IN OUR IMMIGRATION LAWS NOW TO PROTECT OUR COUNTRY. PLEASE DO NOT LET YOUR COUNTRY DOWN. THANK YOU.

AR002708

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5r-rk8o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1042

Comment Submitted by Janet Franklin

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## Submitter Information

**Name:** Janet Franklin

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## General Comment

There is no point to this except to increase suffering for immigrants and increase stress on service providers who work with immigrants. It's transparent pandering. We see you.

AR002709

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-zp1n <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1043

Comment Submitted by Victor Goodwin

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## Submitter Information

**Name:** Victor Goodwin

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## General Comment

Please do away with the ridiculous arbitrary timeline. Thanks

AR002710

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-ovt3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1044

Comment Submitted by Yvonne Podvin

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## Submitter Information

**Name:** Yvonne Podvin

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## General Comment

FOR GOD'S SAKE IT IS TIME NOW to support this president in his goals to keep this country free from those that would hurt our country and our children and grandchildren as they become old enough to work and serve. Save our country for those individuals if not for ourselves!!!!

AR002711

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-il3l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1045

Comment Submitted by Louie Hendrick

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## Submitter Information

**Name:** Louie Hendrick

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## General Comment

Thirty days in which to "vet" asylum seekers is ridiculously inadequate. At least six months should be available.

AR002712

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-plgy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1046

Comment Submitted by Randy Coleman

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## Submitter Information

**Name:** Randy Coleman

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## General Comment

Close the asylum loopholes! Also Congress must ensure that funding for more immigration judges is made available immediately and work with agencies to streamline the hiring process. Stop the insanity of rewarding illegal aliens to invade our country.

AR002713



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-92qo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1047

Comment Submitted by Tom Bernson

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## Submitter Information

**Name:** Tom Bernson

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## General Comment

Support President Trump in his effort to secure our country.

AR002714

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-go4a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1048

Comment Submitted by Varsha Kayi, Kayi & Wilkes PLLC

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## Submitter Information

**Name:** Varsha Kayi

**Submitter's Representative:** Varsha Kayi

**Organization:** Kayi & Wilkes

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## General Comment

To Whom It May Concern:

Kayi & Wilkes PLLC respectfully submits this comment to the Department of Homeland Security's Notice of Proposed Rulemaking on Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

Interest in the Proposed Rule:

For over six years, our law firm has represented asylum-seekers, in both the affirmative and court-based asylum processes. Due to increased backlogs and delays and rescheduling within the immigration court system, our clients generally wait 5+ years before receiving a decision on their asylum case. While they initially may receive minimal support from a community member or church, they are primarily dependent on themselves to work and support their family. Their EAD is vital to their survival.

One of our clients works night shifts to pay for her medical school education. She is one of the only female graduates of a medical school in Saudi Arabia and is required to retake her courses to be certified to practice in the U.S. Another client drives Uber to support his wife and 5 daughters, two of whom are attending college in Boston. Another client has used his EAD to start a non-profit that supports a minority Christian group in Maryland. Many of our clients are not only using their EAD to support themselves but also are being fully relied upon by their families abroad.

Comments:

AR002715

EADs IMPROVE THE EFFECTIVENESS OF THE IMMIGRATION SYSTEM. EADs enable our clients to hire experience immigration attorneys that can help them navigate the immigration system. Without an immigration attorney, applicants who appear before court are rescheduled for their hearing and required to take the time to find an attorney. This clogs the court system that should be using its resources to adjudicate cases. Further EADs allow clients to afford transportation to their hearings, pay for medical and psychological reports, and obtain documents from abroad to help support their case.

DELAYED EADs CREATE A COSTLY RIPPLE EFFECT: All aspects of an asylum seekers life will be effected if EADs are delayed. They will be unable to access health care services which could lead to untreated physical and mental health issues. They will face challenges obtaining a driver's license which can prohibit their duties to get their children to school, to attend USCIS biometrics appointments, and court hearings. Finally, it will create significant financial hardship to individuals and families fleeing persecution.

DELAYED EADs DELAY REVENUE TO LOCAL, STATE, and FEDERAL GOVERNMENT: Local, state, and federal governments will lose income tax revenue from asylum-seekers who are delayed in entering the job market or forced to work in the shadow economy. DHS estimates that the annual Medicare and social security revenue loss to the government to be between \$39.15 to \$118.54 million dollars. DHS estimates the rule will cause asylum-seekers to annually lose \$255.88 to \$774.76 million in income.

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5t-exkv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1049

Comment Submitted by Florence White

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## Submitter Information

**Name:** Florence White

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## General Comment

I want my president to do his job. So please support him 100% in the effort to control Immigration, in the United States. He is doing a great job.

AR002717

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-tc6p
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1050

Comment Submitted by Judy Faulkner

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## Submitter Information

**Name:** judy Faulkner

---

## General Comment

My husband and I are totally behind president Trump. Listen to the will of the people! Protect our borders, our cities, our states, our families, and our children. Do it without hesitation. Make the American Citizens proud of you!

AR002718

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-sxm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1051

Comment Submitted by Art Sthiaire

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## Submitter Information

**Name:** Art sthiaire

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## General Comment

Help Trump to Keep us safe. Do your job.

AR002719

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-kxxw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1052

Comment Submitted by E Esqueda

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## Submitter Information

**Name:** E Esqueda

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## General Comment

To Whom it May Concern,

Work together alongside President Trump and his administration to secure America's borders. By doing nothing , you encourage a world view that America is weak and fractured. Remember, UNITED. WE STAND. You have an opportunity to show courage and do what is right. I respectfully request you do just that.

AR002720

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-prfr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1053

Comment Submitted by James Jardine

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## Submitter Information

**Name:** James Jardine

---

## General Comment

Please use some common sense when comes to illegal immigration. With so many poring across the border 30 days is near impossible to meet

AR002721



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-rowd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1054

Comment Submitted by Judith Redden

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## Submitter Information

**Name:** JUDITH REDDEN

---

## General Comment

Instead of giving the Trump Administration enough time to thoroughly check the background of every asylum seeker, they're being forced to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline. We need to be safe in our own country. Do not let people in here when we do not know who they are.

AR002722

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-h35v <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1055

Comment Submitted by Gregory Bradley

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## Submitter Information

**Name:** Gregory Bradley

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## General Comment

TRUMP is trying to fix what you have screwed up, so start working with him!

AR002723

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-qvsd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1056

Comment Submitted by William Watts

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## Submitter Information

**Name:** William Watts

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## General Comment

We need to stop the time limit on checking asylum seekers now.

AR002724

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-exxt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1057

Comment Submitted by Melissa Fieleke

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## Submitter Information

**Name:** Melissa Fieleke

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## General Comment

I support President Trump. Hes here for the American People. I support the Immigration Reforms.

AR002725

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-wtjt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1058

Comment Submitted by Robin Jackson

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## Submitter Information

**Name:** Robin Jackson

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## General Comment

Please give the Trump Administration enough time to thoroughly check the background of every asylum seeker. Do not force them to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline.

AR002726

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-a3hq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1059

Comment Submitted by Mary Linne

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## Submitter Information

**Name:** Mary Linne

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## General Comment

Please support President Trump! These timelines that are in place are ridiculous and make our country less safe from the corrupt illegals that want to come in and do harm. It undermines those that follow our laws that come over legally. Where is the common sense? Support our President!

AR002727

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6d-y0d1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1060

Comment Submitted by Edward Biehle

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## Submitter Information

**Name:** Edward Biehle

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## General Comment

Stop cutting corners on background checks for immigration. Do a complete check or send them back.

AR002728

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-7wss
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1061

Comment Submitted by Suzanne Bradley

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## Submitter Information

**Name:** Suzanne Bradley

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## General Comment

Please support a President Donald Trumps immigration reform. Stop the ridiculous timeline. Please help secure our borders do that myself and my family can feel like we are safe in our own country.

AR002729



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-h21u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1062

Comment Submitted by James Burt

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## Submitter Information

**Name:** James Burt

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## General Comment

The arbitrary 30 day time limit for background checks on asylum seekers is ridiculous. It is clear that imposing such a short deadline for this important task is designed solely to "short-circuit" the process and render it invalid while preserving the appearance of an effective process.

It is no secret that most Americans currently hold the DC bureaucracy in utter contempt. Shenanigans like this are a classic example of why. Please extend or eliminate this arbitrary time-frame, and restore at least a semblance of integrity to this important process.

AR002730

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-po4l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1063

Comment Submitted by Joyce Campbell

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## Submitter Information

**Name:** Joyce Campbell

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## General Comment

Please support President Trumps Immigration reform. I love my country and want it safe for future CITIZENS. There needs to be reforms and law and order restored.

AR002731

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d62-gufb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1064

Comment Submitted by Susan Junge

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## Submitter Information

**Name:** Susan Junge

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## General Comment

I think it is time the Congressmen think about the safety of the hard working Americans. We want stricter immigration laws. I'm tired of illegal immigrants having more financial aide than the American citizens. That is why so many are coming here, they are getting hand outs.

AR002732

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5w-9yy4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1065

Comment Submitted by Raymond Jones

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## Submitter Information

**Name:** raymond jones

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## General Comment

ENOUGH allready shut the boder down and kick the invaders out NOW!!!!!!

AR002733

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d68-zsz7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1066

Comment Submitted by David Singer

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## Submitter Information

**Name:** David Singer

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## General Comment

Removing the arbitrary timeline will keep Americans safer.

AR002734

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-ilcf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1067

Comment Submitted by Ariel Cruz

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## Submitter Information

**Name:** Ariel Cruz

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## General Comment

No more illegals

AR002735

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-6oza <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1068

Comment Submitted by James Mayhugh

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## Submitter Information

**Name:** James Mayhugh

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## General Comment

support President Trump's reforms

AR002736

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-nucl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1069

Comment Submitted by Sunya Milner

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## Submitter Information

**Name:** Sunya Milner

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## General Comment

The radical left is jeopardizing our national security and punishing legal immigrants who are obeying our laws. You must stop them from undermining President Trumps presidency and keeping the immigration system broken

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AR002737



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d62-aoeg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1070

Comment Submitted by Corinne Sampson

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## Submitter Information

**Name:** Corinne Sampson

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## General Comment

Let's get realistic here and start protecting our country by doing thorough background checks . No arbitrary timeline.

AR002738

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-wu0l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1071

Comment Submitted by Matthew Crucitt

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## Submitter Information

**Name:** matthew crucitt

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## General Comment

Please support President Trumps reforms to keep our border safe and America safe.

Thank you

AR002739

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-xy0v
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1072

Comment Submitted by Martha Scheifele

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## Submitter Information

**Name:** Martha Scheifele

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## General Comment

Let cancel the ridiculous, and dangerous, timeline, for supposed refugees to be properly vetted. The safety of our citizens is much more important than a delay for illegals.

AR002740

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-13kz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1073

Comment Submitted by Constance Baughan

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## Submitter Information

**Name:** Constance Baughan

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## General Comment

We need to stop letting anyone in our country unless they can have a back ground check. There are to many bad people being let in this country. Just look at what happens to some of our people who go to other countries...jailed for no justifiable reason

AR002741

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-t1gl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1074

Comment Submitted by Sheila Sontag MD

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## Submitter Information

**Name:** Sheila Sontag MD

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## General Comment

I am writing to ask that the 30 day Processing Provision for Asylum Applicants NOT be removed. As part of Physicians for Human Rights I provide pro bono psychiatric assessments for asylum seekers, generally children and teens, as I am a Child and adolescent psychiatrist.

Asylum seekers do not arrive with incomes and financial resources. They seek asylum because their lives and the lives of their family members are not secure in their home countries.

Most of the children and adolescents whom I meet with are coming from Central America. Travelling north is dangerous and not undertaken lightly. In many cases a family sends a daughter who is nearing puberty and beginning to attract the attention of gang members eager for a "girl friend." There can be threats to kill relatives if she declines to take on this role and girls are well aware that such threats have been carried out.

AR002742

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-7rt7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1075

Comment Submitted by Deborah Allen

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## Submitter Information

**Name:** DEBORAH ALLEN

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## General Comment

Any illegal person entering America, needs to be vetted, to be able to turn away sex offenders and murderers. Please vote for President Trumps immigration laws.

AR002743

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-uekx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1076

Comment Submitted by Jacqueline Magnuson

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## Submitter Information

**Name:** Jacqueline Magnuson

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## General Comment

My family wants rule of law for everyone. Trump's Immigration reforms are fair for everyone. Security is a major component to our American culture and future strength of our Nation.  
Vote and Support the United States of America for We The People.  
thank you.

AR002744

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-rmji <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1077

Comment Submitted by Mark Thompson

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## Submitter Information

**Name:** Mark Thompson

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## General Comment

Stop the forced arbitrary timeline to allow asylum seekers into our country without proper vetting.

AR002745



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-z9h2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1078

Comment Submitted by Jim Picanco

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## Submitter Information

**Name:** Jim Picanco

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## General Comment

Do your jobs. Support immigration reform .

AR002746

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-evy8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1079

Comment Submitted by Jonnie Steiner

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## Submitter Information

**Name:** Jonnie Steiner

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## General Comment

Stop illegal immigration, socialism and the lying Democrats trying to impeach the President because he is strong and hard working for America.

AR002747

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-6kby
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1080

Comment Submitted by GLENN NELSON

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## Submitter Information

**Name:** GLENN NELSON

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## General Comment

I am trying to observe and promote common sense approach to immigration problems. Obviously, Congress is not going to perform their duty to correct immigration law. I live in the north midwest portion of the country, but still observe the immigration problems. Please find the direction to influence proper precautions and rules that will objectively review each immigrant that enters or tries to enter our country legally. If they come illegally, then they should be caught and returned to the country of origin.

Thank you for reviewing the immigration process.

AR002748

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6d-x5y1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1081

Comment Submitted by Gary Esposito

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## Submitter Information

**Name:** Gary Esposito

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## General Comment

You are keeping our immigration system broken and undermine Donald Trumps presidency because of politics. You know you couldn't do the wonderful things that he is doing. You are only showing your disdain for this country by allowing all those illegal immigrants who commit crimes to come to this country, and then get set free in sanctuary cities. It is a most vulvar thing to do to this country because you are jealous of the fantastic job that President Trump is doing.

AR002749

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-dqk9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1082

Comment Submitted by Sally Taylor

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## Submitter Information

**Name:** Sally Taylor

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## General Comment

Please support President Trump and his efforts to check asylum seekers in the U.S. The law says that we have 30 days to check, and some people are much more dangerous. We need to build the wall as soon as possible as well.

AR002750

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-rfxo <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
---

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1083

Comment Submitted by Richard Menius

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## Submitter Information

**Name:** Richard Menius

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## General Comment

Stop illegal immigration from happening in the USA.

AR002751

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-2zho
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1084

Comment Submitted by Dawn Ray

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## Submitter Information

**Name:** Dawn Ray

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## General Comment

American citizens and the national security of our nation should be paramount in allowing immigrants into our nation. Complete vetting should take place irrespective of arbitrary fixed guidelines.

AR002752

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-vgb1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1085

Comment Submitted by Charles Orvik

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## Submitter Information

**Name:** Charles Orvik

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## General Comment

Remove the arbitrary bureaucrtic timeline so the USA can place knowing who are entering our country.be a safer

AR002753



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-sisa
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1086

Comment Submitted by Paul Murray

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## Submitter Information

**Name:** Paul Murray

---

## General Comment

Support President Trump's immigration reforms. I live near Charlotte, North Carolina and the crime, due to it being a sanctuary city is on the rise. Homelessness is on the rise and it is becoming increasingly dangerous. How about doing something for Americans for a change!

AR002754

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5v-jj81 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1087

Comment Submitted by John Bruening

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## Submitter Information

**Name:** John Bruening

---

## General Comment

Stop trying to destroy this country

AR002755

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d68-defx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1088

Comment Submitted by Terri Barrett

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## Submitter Information

**Name:** Terri Barrett

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## General Comment

Please Help OUR President, make our country safe. The nonsense the house is doing, is crazy! Again OUR Country needs to be safe. Support President Trump

AR002756

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d62-ajjw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1089

Comment Submitted by George Schultze

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## Submitter Information

**Name:** George Schultze

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## General Comment

Please change the 30 day time restrictions for vetting asylum seekers to a more reasonable duration so our people can do a through job.

AR002757

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-4o7u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1090

Comment Submitted by Sonja Nutter

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## Submitter Information

**Name:** Sonja Nutter

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## General Comment

Please support our President and his immigration reforms. let's make our country safe for everyone.

AR002758

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-3af4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1091

Comment Submitted by John Williams

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## Submitter Information

**Name:** John Williams

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## General Comment

Cut the crap

AR002759

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-53kc <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1092

Comment Submitted by Brad Folkedahl

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## Submitter Information

**Name:** Brad FOLKEDAHL

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## General Comment

Stop all immigration period. There's more than enough illegals here already.

AR002760

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-etbu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1093

Comment Submitted by Gregory Clement

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## Submitter Information

**Name:** Gregory Clement

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## General Comment

Ensure the safety of the citizens of our country by maintaining strong background checks for every individual entering the country.

AR002761



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5v-3fnb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1094

Comment Submitted by Allen Scheid

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## Submitter Information

**Name:** Allen Scheid

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## General Comment

Please dont make it harder for the immigrants!

If you know their personal stories you know how much they have suffered.

AR002762

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-j8mr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1095

Comment Submitted by Karen Scarber

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## Submitter Information

**Name:** Karen Scarber

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## General Comment

We, the people, want American borders closed except to those immigrants that are vetted and allowed LEGALLY! End the RIDICULOUS timeline, NOW PLEASE!! Thank You!

AR002763

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-6cf7 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1096

Comment Submitted by Lisa Mendenhall

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## Submitter Information

**Name:** Lisa mendenhall

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## General Comment

Please let potus have thirty days to process these illegal aliens.

AR002764

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-yuyt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1097

Comment Submitted by David Gambale

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## Submitter Information

**Name:** David Gambale

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## General Comment

WE need to allow President Trump to reform immigration now. The system has failed us too long.

AR002765

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-bji5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1098

Comment Submitted by William Manners

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## Submitter Information

**Name:** William Manners

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## General Comment

Simply send them all back where they came from, or to the country they entered from! Tell them we don't have the time to process so many, you'll have to go back to your country and apply from there!

AR002766

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-hd1h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1099

Comment Submitted by David Willis

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## Submitter Information

**Name:** David Willis

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## General Comment

Stop illegal immigration and make background checks for legal immigrants through so as not to let someone with a criminal record enter.

AR002767

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-da3q
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1100

Comment Submitted by Denise Cootz

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## Submitter Information

**Name:** Denise Cootz

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## General Comment

Dont jeopardize our national security by not vetting immigrants.  
Support President Trumps immigration reform.  
We must keep America safe.

AR002768

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d62-sn9i
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1101

Comment Submitted by Dory Sjoblom

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## Submitter Information

**Name:** Dory Sjoblom

**Address:**

5310 Tioga St.  
Duluth, MN, 55804-1668

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## General Comment

I do not believe that this proposed rule should be allowed as this change will burden private support systems and charities, make it difficult for small businesses to find workers, and could have many effects in terms of destabilizing communities.

Already, the six-month waiting period places a heavy burden on asylum seekers who were forced to flee, often having to leave behind or spend in transit any resources they may have had. People seeking asylum need to have authorization to be employed so that they aren't so dependent on other people and on private charities. Please do not make this change.

AR002769



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-c8e1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1102

Comment Submitted by Deborah Barney

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## Submitter Information

**Name:** Deborah Barney

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## General Comment

Start to protect the citizens of the UNITED STATES. You letting ILLEGALS in our COUNTRY is sick when their RAPING AND KILLING ALSO SELLING DRUGS.

Im sorry BUT WHAT THE HELL IS WRONG WITH YOU?

I. completely sick Of PAYING FOR EVERYONE ELSE and my SOCIAL SECURITY IS HARDLY NOTHING. IM A DISABLED AMERICAN AND A WIDOW OF A UNITED STATES SERVICE MAN. IS THIS THE THANKS WE GET.

THAT WALL NEEDS TO BE BUILT AND ILLEGALS PROSECUTED ALSO DEPORTED HOW MANY CRIMINALS GET BACK IN.

THATS YOUR FAULT. YOUR SUPPOSED TO BE WORKING FOR U.S. CITIZENS.

SHAME ON ALL OF YOU!!!!!!!!!!

AR002770

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-jp19
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1103

Comment Submitted by Nick Lewman

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## Submitter Information

**Name:** Nick Lewman

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## General Comment

Please write your comment Please keep partisan politics out of this decision and keep America safe by not cutting shor the immigration reforms of the President

AR002771

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-88tb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1104

Comment Submitted by Pat Reuschel

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## Submitter Information

**Name:** Pat Reuschel

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## General Comment

Please make our country a safer place for all to live. Its your job! Help the President to accomplish this. Its life and death important

AR002772

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d69-stpx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1105

Comment Submitted by Vera Lafferty

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## Submitter Information

**Name:** Vera Lafferty

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## General Comment

Please remove time limits to do thorough investigations of each individual. You are jeopardizing the safety of this Country without thoroughly investigating every individual. As you clearly know and understand, a 30 day time limit inhibits this process from being properly completed. Thank you.

AR002773

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5w-5v12 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1106

Comment Submitted by Diana Miller

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## Submitter Information

**Name:** Diana Miller

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## General Comment

Trump is trying to do what is best for this country would you please support him on that

AR002774

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-swj1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1107

Comment Submitted by John Albritton

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## Submitter Information

**Name:** John Albritton

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## General Comment

SEND THEM ALL BACK FROM WERE THEY CAME TILL THEY DO IT WRIGHT

AR002775

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6d-weut
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1108

Comment Submitted by Elizabeth Hudson

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## Submitter Information

**Name:** Elizabeth Hudson

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## General Comment

our country is less safe today because of arbitrary bureaucratic timelines. Instead of giving the Trump Administration enough time to thoroughly check the background of every asylum seeker, theyre being forced to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline. Gave President Trump what he wants because it is what WE THE PEOPLE WANT.

AR002776

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-t3cn <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1109

Comment Submitted by James Stewart

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## Submitter Information

**Name:** James Stewart

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## General Comment

Please remove the stupid timeline for background checks on asylum seekers trying to enter our country, to allow our border patrol to do their job the right way..

AR002777



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-1d6q <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1110

Comment Submitted by Loyd Campbell

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## Submitter Information

**Name:** Loyd Campbell

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## General Comment

Please keep our country safe by removing the ridiculous timeline for vetting asylum seekers. Give them time to do a good job.

AR002778

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-rpk4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1111

Comment Submitted by David Thompson

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## Submitter Information

**Name:** David Thompson

---

## General Comment

Please stop the madness of allowing asylum seekers to be released into the country before their background can be checked. I insist that you support President Trumps immigration policies before one more American citizen has to suffer loss at the hands of those not entitled to asylum or in the country illegally! Thank you!

AR002779

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d62-gs52 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1112

Comment Submitted by Ronnie Schwartz

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## Submitter Information

**Name:** RONNIE SCHWARTZ

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## General Comment

You need to extend the 30 day limit to complete paperwork on illegals entering this country. Whats the rush? Protection of American citizens is far more important than rushing to herd these illegals into the US. Stop the immigration entirely. We have enough illegals and terrorists coming here and it needs to be stopped entirely.

AR002780

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-1mec <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1113

Comment Submitted by Patrick Harris

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## Submitter Information

**Name:** Patrick Harris

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## General Comment

Support President Trumps Immigration Reform, Please, Thank You.

AR002781

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6d-lguv <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1114

Comment Submitted by Gary Metzinger

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## Submitter Information

**Name:** Gary Metzinger

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## General Comment

Write the regulations to allow a reasonable time to visit immigrants so that we dont compromise US citizen safety and security.

AR002782

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d68-bmh2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1115

Comment Submitted by Maureen Courtney

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## Submitter Information

**Name:** Maureen Courtney

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## General Comment

President Trump's immigration reforms. Stop letting people cross our border illegally without being properly vetted.

AR002783

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-upqm <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1116

Comment Submitted by David Wendell

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## Submitter Information

**Name:** David Wendell

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## General Comment

A true liberal stance: protect innocent human beings - stop the killing of unborn BABIES. Thank you !

AR002784

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-ts6y
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1117

Comment Submitted by Robert Green

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## Submitter Information

**Name:** Robert Green

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## General Comment

Please permit the following quote to speak for millions of American citizens, both native-born and legally naturalized, who oppose: the illegal entry of foreign nationals into this country; the use of a non-merit based visa lottery; unvetted chain migration; the abuse of birthright citizenship; and the use of taxpayer money to pay any form of welfare to those persons present in this country without legal authorization:

Every sovereign nation has the authority to determine who can be a citizen and who can be present within its borders. As the nations former chief law enforcement officer, and a citizen who believes in the rule of law, I cannot condone anyone coming into this country illegally. We are a nation of laws. When people fail to follow the law with impunity, it encourages further disobedience and breeds disrespect for the rule of law; and that is not America. -- Alberto Gonzales, the nations 80th Attorney General, speech to the Austin Economics Club. WHERE THERE IS NO PENALTY FOR VIOLATIONS, WHAT BENEFIT IS ANY LAW?

The president must be permitted to fulfill his U. S. Constitutional DUTY under Article 4, Section 4, to wit: The United States shall guarantee to every State in this Union a Republican Form of Government, and shall protect each of them against Invasion; and on Application of the Legislature, or of the Executive (when the Legislature cannot be convened) against domestic Violence.

Without question, the MILLIONS of foreign nationals currently in the country who have either entered illegally or are just present without current authorization constitute an invasion crisis; plus, the violent crimes, theft and the fraudulent consumption of welfare, medical and educational services, etc., by this category of persons certainly meets my definition of serious domestic and economic violence being perpetrated against American citizens.

AR002785



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-7t6r
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1118

Comment Submitted by Marjory Ward

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## Submitter Information

**Name:** Marjory Ward

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## General Comment

Hell our nation do your job

AR002786

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-kopf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1119

Comment Submitted by Pat Ugowski

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## Submitter Information

**Name:** Pat Ugowski

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## General Comment

Please keep our borders safe for all LAW ABIDING immigrants. Since when has disobeying the law become the norm in this nation? Please support President Trump's immigration reforms. Protect our laws!

AR002787

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-6yas
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1120

Comment Submitted by Lisa Groenewold

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## Submitter Information

**Name:** Lisa Groenewold

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## General Comment

Please support President Trump's Immigration Reforms.

President Trump has the best interest of our country in mind with every decision he makes.

AR002788

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-swwi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1121

Comment Submitted by Jimmy Smith

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## Submitter Information

**Name:** Jimmy Smith

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## General Comment

I am writing to ask you support President Trumps immigration reforms. This is one of the many reasons that I voted for him and I would like you to support him too.

AR002789

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-70e5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1122

Comment Submitted by Richard Hanson

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## Submitter Information

**Name:** Richard Hanson

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## General Comment

President Trump and his duly appointed officials are in charge as per We The People. The unelected beaurocrats are to follow instructions. The Constitution is the supreme law of the land and it is written in fairly plain language.

AR002790

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d69-551v
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1123

Comment Submitted by Ramona Grooms

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## Submitter Information

**Name:** Ramona Grooms

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## General Comment

For the health and safety of this country it is time to help President Trump instead of trying to block his every move. Time to walk with integrity and let go of the evil ways of the past.

AR002791

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-romq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1124

Comment Submitted by Olen Gray

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## Submitter Information

**Name:** Olen Gray

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## General Comment

We The American Citizens

AR002792

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-gdtq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1125

Comment Submitted by Charlene Bennett

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## Submitter Information

**Name:** Charlene Bennett

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## General Comment

Do something for the safety of americans for once. YOU WORK FOR US! NOT THE OTHER WAY AROUND. OUR TAXES PAY FOR OVER INFLATED PAYCHECKS. NONE OF YOU DESERVE WHAT YOU PAY YOURSELVES FOR DOING NOTHING!

AR002793



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5v-yqjn <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1126

Comment Submitted by Larry Haas

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## Submitter Information

**Name:** Larry Haas

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## General Comment

Please allow President Trump to fix our dangerously open borders. One of his promises was to close the open border, and that was one of the reasons he's President.

AR002794

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-dv57 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1127

Comment Submitted by Marie Bastone

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## Submitter Information

**Name:** Marie Bastone

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## General Comment

Support Trump's immigration reform now, there is NO more time to lose!

AR002795

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-sn28
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1128

Comment Submitted by Janet Ulmer

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## Submitter Information

**Name:** Janet Ulmer

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## General Comment

Please support President Trump's immigration reforms. The limited timeline that the Democrats insist on is not appropriate for the security of our nation. It is only inviting criminals to come to the United States.

AR002796

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5v-j5dp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1129

Comment Submitted by Elizabeth Moore

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## Submitter Information

**Name:** Elizabeth Moore

**Address:**

1344 4th St SW

Washington, 20024

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## General Comment

I am a volunteer with multiple organizations that help asylum seekers and am currently working with a woman from El Salvador whose case is set for 2021.

Her work authorization is critical to her wellbeing and ability to support herself. I know the US government does not want more people relying on public services, and issuing asylum seekers work authorizations in a timely manner facilitates greater financial independence. In the case of the asylum seeker I am helping, her work authorization has allowed her to earn money to feed her family (so her children no longer need to rely exclusively on their public school for food), buy clothes and other necessary items (and pay the associated taxes), and integrate into American society. Her working also means she pays both federal and state taxes.

Asylum seekers want to work. They don't wish to be dependent on nonprofits and have their children dependent on government help. Processing work authorizations quickly will save the government money overall and in fact add money into the federal and state budgets because more taxes will be paid.

Please oppose the change to the current processing timeframe.

AR002797

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-tnrb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1130

Comment Submitted by Shane Shelley

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## Submitter Information

**Name:** Shane Shelley

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## General Comment

Immigration rules need to be followed and immigrants need to be fully vetted before being released into our country. Borders must be maintained and defended for our security.

AR002798

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-1bwf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1131

Comment Submitted by Robert Glaser

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## Submitter Information

**Name:** robert glaser

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## General Comment

democrats are leftist/communists and will destroy this country if given the chance. which, will happen eventually as all school children are being indoctrinated for the future. leftists have all the time in the world and they will use it!!

AR002799

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-kbuq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1132

Comment Submitted by Claudia Mouton

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## Submitter Information

**Name:** Claudia Mouton

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## General Comment

Please help President Trump by ending all arbitrary timelines.

AR002800

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-cq8j
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1133

Comment Submitted by Adam Frieholtz

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## Submitter Information

**Name:** Adam Frieholtz

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## General Comment

We all need to support our President and his policies. I along with my family and the majority of the people I interact with support Mr. Trumps ideas on immigration reform. All of our government officials need to realize how much support the President has and those who oppose his ideals and do not support the publics needs will be removed or voted out of office. We the people are tired of the corrupt, deceitful and slanderous government officials who are disregarding the wishes and demands of the American Public and are taking to the polls. Please seriously consider my words and do the right thing. These words come from a disabled Marine Combat Veteran.

AR002801



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-bb7e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1134

Comment Submitted by Bethany Anonymous

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## Submitter Information

**Name:** Bethany Anonymous

**Address:**

Chicago, IL,

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## General Comment

I am in favor of allowing asylum seekers to submit their applications earlier. This would still give time for the department to process applications. The delay is unnecessary. I work closely with Asylum Seekers and their passion to work and thrive in the US is incredible. This barrier will be devastating to newcomers and to the US economy as we are expected to lose millions of taxable income each year. The lack of income would negatively affect the success of asylees in the US and put them at economic risk. I urge the administration to consider these issues.

AR002802

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-3yxz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1135

Comment Submitted by Genevieve White

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## Submitter Information

**Name:** Genevieve White

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## General Comment

I am done with the games congress is playing with our President. I am done with the Democrats and their attempt to try any measure to impeach President Trump. Please leave President Trump and his immigration reforms plans alone and let him do his job.

AR002803

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-lp6j
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1136

Comment Submitted by Jon Lindberg

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## Submitter Information

**Name:** Jon Lindberg

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## General Comment

Please support reform changes to Immigration or it will stay in the mess it is now. We should strive to be better than to just stay the same.

AR002804

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-r40d
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1137

Comment Submitted by William Glass

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## Submitter Information

**Name:** William Glass

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## General Comment

Either support the President or face the wrath of the American people.

AR002805

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-efwj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1138

Comment Submitted by Madeline Jones

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## Submitter Information

**Name:** Madeline Jones

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## General Comment

PRESIDENT TRUMP NEEDS YOUR HELP PLEASE SUPPORT HIS IMMIGRATION REFORM MEASURES.FOR OUR SAFERY

AR002806

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d60-otm5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1139

Comment Submitted by Zeba Arif

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## Submitter Information

**Name:** Zeba Arif

**Address:**

1419 W Touhy ave #12

Park Ridge, IL, 60068

**Email:** Zeba.mahnaz@gmail.com

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## General Comment

This rule is not fair and will impact lives of many people. I don't agree with this rule.

AR002807

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-f9vw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1140

Comment Submitted by Ryan Riedel

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## Submitter Information

**Name:** Ryan Riedel

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## General Comment

Please support the President's immigration reforms. Thank you

AR002808

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-4fuj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1141

Comment Submitted by John Royer

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## Submitter Information

**Name:** John Royer

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## General Comment

Please protect us from the open southern borders. It is Unamerican not to protect us tax paying, voting citizens .

AR002809



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5w-1uc0 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1142

Comment Submitted by Tommy McKee

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## Submitter Information

**Name:** Tommy McKee

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## General Comment

If you love America you need to support our president.

AR002810

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-7lis <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1143

Comment Submitted by Sandra Hudson

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## Submitter Information

**Name:** Sandra Hudson

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## General Comment

Our Presidents Immigration reforms need to be supported. Proper vetting of Immigrants without cutting corners is unacceptable. The safety of Americans is a priority. Support President Trump. He has our Countries best interests in mind. So should you. Cutting corners is not in the countries best interest. God Bless America.

AR002811

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-qilz <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1144

Comment Submitted by Catherine Huisman

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## Submitter Information

**Name:** Catherine Huisman

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## General Comment

We see every day the problems generated by not having a secure border, part of being secure is having the proper time to process/question etc. each person trying to come into our country, those who are illegal must be kept out until such time as they are properly vetted and gone through processes provided by our legal system. Allowing anything less is a travesty and is unfair to the many who have entered our great country through the proper process. Please see that system protects USA!

AR002812

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-yykj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1145

Comment Submitted by John Bothwell

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## Submitter Information

**Name:** John Bothwell

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## General Comment

We need to find the truth no matter how long it takes!

AR002813

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-3338 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1146

Comment Submitted by Bill Ricker

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## Submitter Information

**Name:** Bill Ricker

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## General Comment

Support Trump's reforms!!!!!!

AR002814

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-e5qy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1147

Comment Submitted by Michael Artmann

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## Submitter Information

**Name:** Michael Artmann

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## General Comment

How many people have to die before you will support our PRESIDEDENT? Please!

AR002815

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-rck1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1148

Comment Submitted by Troy Harding

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## Submitter Information

**Name:** Troy Harding

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## General Comment

Please allow President Trump to vet immigrants properly before allowing them into our country. This is a no brainer. The only way you could screw this one up is if someone was paying you too. These people should be vetted as if they were renting a room in your personal residence.

AR002816

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-71bl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1149

Comment Submitted by Mary Myers

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## Submitter Information

**Name:** Mary Myers

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## General Comment

Keep our country safe. All individuals seeking asylum should be thoroughly vetted. America first

AR002817



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-6js8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1150

Comment Submitted by Robert Mahaffey

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## Submitter Information

**Name:** Robert Mahaffey

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## General Comment

Support President Donald Trumps Immigration Reforms, to keep our Country safe.

AR002818

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-6df0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1151

Comment Submitted by Floyd Wilson

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## Submitter Information

**Name:** Floyd Wilson

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## General Comment

30 days is a ridiculous amount of time to do a background check on a foreigner,you cannot possibly do a proper vetting of a foreigner in that amount of time.This affects everyone in this country's safety.

AR002819

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d69-5hza <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1152

Comment Submitted by Robert Stauffer

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## Submitter Information

**Name:** Robert Stauffer

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## General Comment

Reform all now to keep us safe

AR002820

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-q8hr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1153

Comment Submitted by Eddie Heskett

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## Submitter Information

**Name:** Eddie Heskett

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## General Comment

A short time line for evaluation is not appropriate in cases with normal complexity. Please improve this.

AR002821

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-7mia <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1154

Comment Submitted by David Coeur

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## Submitter Information

**Name:** David Coeur

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## General Comment

Support President Trump's immigration plans or get out of office.

AR002822

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-d1kn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1155

Comment Submitted by Gary Minder

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## Submitter Information

**Name:** Gary Minder

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## General Comment

We need to fully check the Identity of people crossing the border to stop crime, drugs, trafficking and terrorists from getting into this country. I don't understand how anyone can think otherwise! Protect this country it is your JOB!

AR002823

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d62-1lji
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1156

Comment Submitted by Rhonda Chadwell

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## Submitter Information

**Name:** Rhonda Chadwell

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## General Comment

Please support President Trump in his efforts toward immigration reform. Protect us, citizens of the United States, from the financial burdens and criminal offenses imposed by immigrants who refuse to be lawful.

AR002824

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-nbxu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1157

Comment Submitted by Lawrence Felkamp

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## Submitter Information

**Name:** Lawrence Felkamp

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## General Comment

We need a stronger border and OUR PRESIDENT is doing what he can without the Democrats backup which a bunch of

BS. IT IS NATION UNDER GOD

GOD BLESS AMERICA AND DONALD J TRUMP (OUR PRESIDENT)

4 MORE YEARS

AR002825



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-cmiq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1158

Comment Submitted by Steve Calhoun

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## Submitter Information

**Name:** Steve Calhoun

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## General Comment

Support President Trump immigration reforms . Fire Pelosi

AR002826

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-5ytv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1159

Comment Submitted by Richard Gilliam

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## Submitter Information

**Name:** Richard Gilliam

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## General Comment

We need to stop playing with the security of the United States. Tragic is it may seem, our elected officials care more about destroying this country than protecting it. Support the President's agenda. Stop acting like communists (many of you are, I have no doubt).

AR002827

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-eb1v
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1160

Comment Submitted by John Stowe

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## Submitter Information

**Name:** John Stowe

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## General Comment

It is imperative that you wholeheartedly support President Trumps immigration reforms.

AR002828

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d69-e3up
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1161

Comment Submitted by David Mackey

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## Submitter Information

**Name:** David Mackey

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## General Comment

Support the President of the United States immigration Reforms. Effective immediately. Thank you do the right thing for our country.

AR002829

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-bxh8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1162

Comment Submitted by Patrick Murphy

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## Submitter Information

**Name:** patrick murphy

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## General Comment

With the ideas President Trump has laid out will do more to protect us than has ever been done in many years. And we the people need these changes done now. So i hope you will help pass all his reforms now.

AR002830

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6d-sr08
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1163

Comment Submitted by John Piesyk

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## Submitter Information

**Name:** John Piesyk

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## General Comment

You should be supporting our president and country that is why you were chosen.

AR002831

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-k8sk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1164

Comment Submitted by Jennifer Smith

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## Submitter Information

**Name:** Jennifer Smith

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## General Comment

Please support President Trumps immigration reforms and cut the red tape!!!

AR002832

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d62-cfaa <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1165

Comment Submitted by Richard Jagel

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## Submitter Information

**Name:** Richard Jagel

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## General Comment

Be realistic, more time is need to vet people!!!!!!!!!!!!!!

AR002833



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-ezw1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1166

Comment Submitted by Philip Palermo

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## Submitter Information

**Name:** PHILIP PALERMO

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## General Comment

Support Trump, save America!

AR002834

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-ppw7 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1167

Comment Submitted by Earl Lovejoy

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## Submitter Information

**Name:** Earl Lovejoy

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## General Comment

Please stop the politics and pass the reform bill.

AR002835

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5x-3v0f <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1168

Comment Submitted by Erma Larimore

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## Submitter Information

**Name:** Erma Larimore

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## General Comment

Please allow this change to our immigration timeline. It makes the U.S. vulnerable to illegals and terrorist. You need to be working for the American people. I don't understand how all of you in public office are so willing to destroy our country just because you don't like the president. You act like spoiled little brats getting upset because you didn't get your way. Grow up and do your job. Protect our country, borders and people.

AR002836

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-y1f1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1169

Comment Submitted by Marlene Rearden

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## Submitter Information

**Name:** Marlene Rearden

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## General Comment

Support President Trump and his immigration policy. All aliens stopped at the borders need to be vetted for the safety of our citizens.

AR002837

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-8vud <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1170

Comment Submitted by Sandra Nickerson

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## Submitter Information

**Name:** Sandra Nickerson

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## General Comment

Please support President Trump's immigration reforms. It's important that all potential immigrants be thoroughly screened for the safety of our country and people.

AR002838

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-mk4g
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1171

Comment Submitted by Tom Johnson

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## Submitter Information

**Name:** Tom Johnson

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## General Comment

I want to urge you to support President Trumps immigration reform.

AR002839

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-n6rs <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1172

Comment Submitted by Mark Berger

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## Submitter Information

**Name:** Mark Berger

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## General Comment

No to cutting corners, no to timelines...YES to immigration reform..support President Trump!

AR002840

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-p3ci
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1173

Comment Submitted by Grace Korman

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## Submitter Information

**Name:** Grace Korman

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## General Comment

Please support president Trump's immigration reform. I became a citizen 20 years ago, and it's not fair to see coming from another country the horrendous changes that are happening to my beloved USA. We owe Respect to the laws of each and every country of the world and the USA deserves it and their citizens.

AR002841



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-aty <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1174

Comment Submitted by Carolyn Buchanan

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## Submitter Information

**Name:** Carolyn Buchanan

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## General Comment

You need to be true to our Constitutional Republic and protect our country.

AR002842

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-10th
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1175

Comment Submitted by Michael Cone

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## Submitter Information

**Name:** Michael Cone

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## General Comment

I cannot believe this is the same country where I grew up . I am so disgusted with Democrats (and I grew up a democrat). PLEASE fix the system!

AR002843

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-s06w
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1176

Comment Submitted by June Gagnon

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## Submitter Information

**Name:** June Gagnon

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## General Comment

For the safety of our nation and our citizens, our sovereignty and economic stability, support President Trump's Immigration Reforms!

AR002844

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-yqvr <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1177

Comment Submitted by Juanel Robinson

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## Submitter Information

**Name:** Juanel Robinson

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## General Comment

Please, we need to know about each person coming into our country, no matter how long it takes.

AR002845

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-229l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1178

Comment Submitted by Ella Wentworth

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## Submitter Information

**Name:** Ella Wentworth

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## General Comment

Please stop this nonsense regarding immigration and support President Donald Trump and his immigration reforms so that America will once again be safe!

AR002846

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5w-oexk <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1179

Comment Submitted by David Miller

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## Submitter Information

**Name:** David Miller

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## General Comment

Stop illegal immigration!

AR002847

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-gcmt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1180

Comment Submitted by Kathleen Stagnaro

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## Submitter Information

**Name:** kathleen stagnaro

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## General Comment

Support our president as he is making America safe for you, too. His ideas have already proven to be forwarding the USA to be a safer nation.

AR002848

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5w-wwyx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1181

Comment Submitted by Shirley Howard

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## Submitter Information

**Name:** Shirley Howard

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## General Comment

Please support our Presidents immigration reform Bill. If you love our country and want to keep it safe please support our great President Donald J. Trump. The DEMWITS have have been a thorn in the flesh to our President. Help him Build the Wall and keep America SAFE!

AR002849



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6d-9gm9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1182

Comment Submitted by Hallis Campbell

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## Submitter Information

**Name:** Hallis Campbell

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## General Comment

Remove the bureaucratic time limit to review asylum claims by illegal immigrants. The safety of our country is vital for everyone, including those who are valid in their asylum claims.

AR002850

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-1am4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1183

Comment Submitted by Donna Parrott

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## Submitter Information

**Name:** Donna Parrott

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## General Comment

This needs to be taken care of now to protect USA citizens!!! So support our presidents effort to have immigration reform!!!

AR002851

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-mlyj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1184

Comment Submitted by Sherri Wiseman

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## Submitter Information

**Name:** Sherri wiseman

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## General Comment

National Security is a high priority for me as an American security. One of the best ways is to screen immigrants thoroughly. By law the administration has 30 days to screen immigrants. Please do not try to make the screening shorter than the law.

These is vital to making a our nation secure!

AR002852

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-jwoz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1185

Comment Submitted by Timothy Michael

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## Submitter Information

**Name:** Timothy Michael

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## General Comment

Please support President Trumps immigration reforms. Our country is less safe and we need more border security.

AR002853

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d68-iors <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1186

Comment Submitted by DeVon Mecham

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## Submitter Information

**Name:** DeVon Mecham

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## General Comment

Please support President Trump on the issue of immigration!

AR002854

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-ibsa
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1187

Comment Submitted by Paul Michaelson

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## Submitter Information

**Name:** Paul Michaelson

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## General Comment

Stop putting your leftist agenda above our security. Stop interfering with our presedent's decisions on immigration policy.

AR002855

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5v-htdn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1188

Comment Submitted by Kartika Hanani

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## Submitter Information

**Name:** Kartika Hanani

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## General Comment

Let us have a good life. We've been struggles in many ways.

AR002856

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-xc9p
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1189

Comment Submitted by Sandra Price

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## Submitter Information

**Name:** Sandra Price

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## General Comment

Instead of protecting Americans, democrats are doing all in their power to put us in danger. And all that is behind it is to try to get votes from these migrants. They don't care anything about them either, but are hiding behind that facade, thinking to fool them into voting for the lying, scheming democratic party!

AR002857



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6e-jc8f <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1190

Comment Submitted by William Lamb

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## Submitter Information

**Name:** William Lamb

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## General Comment

Please fix the wall and enforcement of our immigration policies, give the ICE your full attention, thank you!

AR002858

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5v-8kvt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1191

Comment Submitted by Kevin Pottorff

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## Submitter Information

**Name:** kevin pottorff

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## General Comment

They dont care that these radical restrictions jeopardize our national security or that they punish LEGAL immigrants for obeying our laws. They just want to keep them in place, all so they can keep our immigration system broken and undermine Donald Trumps presidency.

AR002859

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-sdtb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1192

Comment Submitted by Harriet Hancock

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## Submitter Information

**Name:** Harriet Hancock

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## General Comment

I am appalled at the obstruction POTUS Trump has received in every endeavor. And bone so dangerous and economically draining as the broken border to Mexico...

New and better laws and strict enforcement must be enacted, immediately.. too many do called "public servants" including Obama and his cronies have neglected these border issues. He gave his acknowledgement to the problems, but didn't do anything to fix them. Shameful.

I support President Trump's effortd. And do should you!

AR002860

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-z62m <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1193

Comment Submitted by Frances chapman

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## Submitter Information

**Name:** Frances chapman

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## General Comment

Please write your comment here. This is crazy!!! We need to keep our family and our children safe. Please

AR002861

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d5x-y6qd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1194

Comment Submitted by Mike Oden

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## Submitter Information

**Name:** Mike Oden

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## General Comment

Please support Pres. Trump's immigration reforms.

AR002862

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d62-59od <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1195

Comment Submitted by Gary Dawson

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## Submitter Information

**Name:** Gary Dawson

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## General Comment

We want you to support President Trump's Immigration reforms! Especially legal immigrants are angry that illegal immigrants are being giving the opportunities that they had to work for! Support the reforms & keep our country safe! Stop the sanctuary cities from releasing the detainees! This is insanity!! What if it's your family next that is targeted??

AR002863

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-xsj3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1196

Comment Submitted by Lillian Cogniet

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## Submitter Information

**Name:** Lillian Cogniet

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## General Comment

Trump issuing what needs to be done. STOP all the BS against him. We all want to make America great again. You all should be ashamed of yourselves for what your doing to Trump. He is our President like it or not. Have respect people.

AR002864

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-9bh0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1197

Comment Submitted by Delores Corriveau

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## Submitter Information

**Name:** Delores Corriveau

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## General Comment

lease everyone support our President

AR002865



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6d-dlr8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1198

Comment Submitted by Maria Rivillo

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## Submitter Information

**Name:** Maria Rivillo

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## General Comment

Our country is less safe today because of arbitrary bureaucratic timelines. Instead of giving the Trump Administration enough time to thoroughly check the background of every asylum seeker, they're being forced to cut corners and make America less safe. Please understand that these radical restrictions jeopardize our national security. Stand for our nation. Serve and protect it as you have sworn to do by your oath of office. Remove this arbitrary timeline and make America safe again!

AR002866

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6d-r0vl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1199

Comment Submitted by Roy Kinder

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## Submitter Information

**Name:** Roy Kinder

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## General Comment

Stand with President Trump in his effort to secure the border and support His Immigration Reform.

AR002867

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6d-qhlg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1200

Comment Submitted by Bill Werner

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## Submitter Information

**Name:** Bill werner

---

## General Comment

Everyone needs to be properly vetted, with plenty of time for the vetting process to be completed. 30 days is way to short of a time period to properly vet any potential immigrants wanting to come into the USA.

AR002868

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d68-j4j0 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1201

Comment Submitted by Donna Lettsome

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## Submitter Information

**Name:** Donna Lettsome

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## General Comment

Make the changes needed to stop this border madness. Do the reforms NOW!!!

AR002869

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d69-fl5z
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1202

Comment Submitted by John Currier

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## Submitter Information

**Name:** John Currier

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## General Comment

For proper and safe interviewing and determining whether or not a person is justly qualified to be admitted into our country or is a threat to our country, the time for this has to be extended. Let's make and keep America as safe as possible.

AR002870

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-lzji
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1203

Comment Submitted by Kenneth Yoder

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## Submitter Information

**Name:** Kenneth Yoder

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## General Comment

I am writing to ask you to remove the arbitrary timeline to checkout people before allowing them into our country. Please consider my request.

AR002871

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6e-d1lo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1204

Comment Submitted by Joy Deyell

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## Submitter Information

**Name:** Joy Deyell

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## General Comment

I am writing to ask that you support President Trump's immigration reforms.

AR002872

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d68-beuz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1205

Comment Submitted by Dave Cross

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## Submitter Information

**Name:** Dave Cross

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## General Comment

We need the border wall more than ever! The recent murders of Americans in Mexico is one huge reason for the completion of the wall!

Please do the right thing and support the safety of U.S. citizens!

Many thanks!

AR002873



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5u-f9kw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1206

Comment Submitted by Loretta Ekwall

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## Submitter Information

**Name:** Loretta Ekwall

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## General Comment

Please help Trump with his immigration reforms! Our Country needs this!

AR002874

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 04, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d4n-m118
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1207

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Delaying asylum seekers can result in:

Lost income to the asylum seeker and their family

Food insecurity

Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID.

Risk of homelessness/housing insecurity

Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify)

Vulnerability to exploitation, trafficking, and underground economy risks

Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income)

Loss of ability to support themselves and their families

Feelings of fear, desperation, and overall mental health concerns

To name few concerns.

Thank you for your consideration.

AR002875

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 04, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d4r-2zvr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1208

Comment Submitted by Sami DiPasquale

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## Submitter Information

**Name:** Sami DiPasquale

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## General Comment

I am opposed to the change in this regulation.

Delays in asylum seekers getting their work authorization (Employment Authorization Document or "EAD") approval can lead to:

Lost income to the asylum seeker and their family

Food insecurity

Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID.

Risk of homelessness/housing insecurity

Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify)

Vulnerability to exploitation, trafficking, and underground economy risks

Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income)

Loss of ability to support themselves and their families

Feelings of fear, desperation, and overall mental health concerns

AR002876

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d55-8c8w
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1209

Mass Mail Campaign 3: Comment Submitted by Eric Edelman (Total as of 11/7/2019: 17)

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## Submitter Information

**Name:** Eric Edelman

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## General Comment

By law, the Trump Administration has 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit.

This forces bureaucrats to cut corners on background checks and divert valuable resources away from immigrants who are playing by the rules. Thats INSANE!

The Left is supporting a system that jeopardizes our national security just because some bureaucrat came up with an arbitrary timeline. This has to change and it must change NOW!

Please help President Trump remove these ridiculous restrictions and secure Americas safety by supporting his and Ken Cuccinelli's reform efforts!

AR002877

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d55-vxi6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1210

Mass Mail Campaign 5: Comment Submitted by Irena Franchi (Total as of 11/13/2019: 13)

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## Submitter Information

**Name:** Irena Franchi

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## General Comment

Please write your comment here.

AR002878

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d57-k714
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1211

Comment Submitted by Greg Wilson

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## Submitter Information

**Name:** Greg Wilson

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## General Comment

It is IMPERATIVE that we give our Immigration personal ample time to process immigrants seeking asylum and to be sure they are entering the USA with proper screening. This is just common sense! Please do not hamper this process! Thanks you for your consideration.

AR002879

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d57-flsn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1212

Comment Submitted by Kathie Park

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## Submitter Information

**Name:** Kathie Park

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## General Comment

Please support President Trump's immigration reforms. They are very important to our national security.

AR002880

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d58-9gdb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1213

Comment Submitted by Ronnie Minnick

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## Submitter Information

**Name:** Ronnie Minnick

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## General Comment

Support our president on immigration reforms !!!!!

AR002881



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d59-18mp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1214

Comment Submitted by Tim Masters

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## Submitter Information

**Name:** Tim Masters

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## General Comment

let work to straighten out our immigration laws mess

AR002882

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d59-j8pc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1215

Comment Submitted by Stephen Albers

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## Submitter Information

**Name:** Stephen Albers

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## General Comment

Secure the border NOW!

AR002883

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d59-rgga <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1216

Mass Mail Campaign 8: Comment Submitted by Karen Schmidt (Total as of 11/13/2019: 9)

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## Submitter Information

**Name:** Karen Schmidt

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## General Comment

Support President Trump!!!!!!!!!!

AR002884

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d59-8wy7 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1217

Comment Submitted by Norma Yocum

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## Submitter Information

**Name:** Norma Yocum

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## General Comment

Please stand with our President on Immigration Reforms.

AR002885

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d59-fzou
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1218

Comment Submitted by Alice Edwards

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## Submitter Information

**Name:** Alice Edwards

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## General Comment

Washington needs to support President Trump's Immigration Reforms.

AR002886

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5d-4lsd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1219

Comment Submitted by Shelly Osborne

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## Submitter Information

**Name:** Shelly Osborne

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## General Comment

Its time to fix our broken immigration system!! We desperately need to secure our border. We need to know whos coming into our country and help those who are coming here legally get the help they need! Please stand with President Trump and Ken Cuccinelli and fix our broken system.

AR002887

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 05, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5f-5i45 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1220

Comment Submitted by Michael Donahue

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## Submitter Information

**Name:** Michael Donahue

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## General Comment

Build the wall.

AR002888

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 05, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5g-4vnu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1221

Comment Submitted by Yeskiel Stiel

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## Submitter Information

**Name:** YESKIEL STIEL

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## General Comment

Let President Trump do his job!

AR002889



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5h-x1de
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1222

Comment Submitted by Dorothea Williams

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## Submitter Information

**Name:** Dorothea Williams

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## General Comment

LET OUR PRESIDENT BUILD OUR WALL.

ILLEGAL IMMIGRATION MUST BE STOPPED ALONG WITH DRUGS ENTERING AMERICA THAT KILLS THOUSANDS AND THOUSANDS OF AMERICANS EVERY YEAR.

ALSO, THE FAKE IMPEACHMENT AGAINST OUR DULY ELECTED PRESIDENT TRUMP MUST BE STOPPED IMMEDIATELY. IT IS NOT FAIR TO OUR PRESIDENT AND SUPPORTERS NOT TO HAVE DUE PROCESS.

TRUMP

AR002890

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5i-hvyg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1223

Comment Submitted by Charleen Epperley

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## Submitter Information

**Name:** Charleen Epperley

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## General Comment

I support President Trump's immigration reform. Stop trying to derail his purpose

AR002891

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5i-e3pj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1224

Comment Submitted by Alice Detherage

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## Submitter Information

**Name:** Alice Detherage

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## General Comment

Must support Trump as he is for what is good and best for our country.

AR002892

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5l-3sgk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1225

Comment Submitted by Scola Theresa

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## Submitter Information

**Name:** Scola Theresa

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## General Comment

Stop all this nonsense!  
Leave president Trump alone!!!

He cares about the people it dems care about POWER

AR002893

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5l-pmz2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1226

Comment Submitted by Dennis Trimble

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## Submitter Information

**Name:** Dennis Trimble

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## General Comment

Please support President trumps immigration reforms. The system is broken. It is endangering the lives and well-being of all Americans. It is causing people to break the law and discriminating against those who are trying to enter our country legally

AR002894

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5l-bhau
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1227

Comment Submitted by Jerry Payseno

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## Submitter Information

**Name:** Jerry Payseno

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## General Comment

If you had any common sense you would support our President and that is President Trump if you have forgotten and immigration is out of control help to be the better politician...

AR002895

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5l-70gs
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1228

Comment Submitted by Marleen Asbury

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## Submitter Information

**Name:** Marleen Asbury

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## General Comment

Build the wall.

AR002896

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5l-w8r8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1229

Comment Submitted by Hasmik Babaian

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## Submitter Information

**Name:** HASMIK BABAIAN

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## General Comment

I'm a legal immigrant, w had to stay 3rd county over a year in order to apply and submit all document and wait, after one year ,

AR002897



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-gltb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1230

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

No way, please dont do that!

AR002898

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 06, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d5t-y24a <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1231

Comment Submitted by David Tull

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## Submitter Information

**Name:** David Tull

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## General Comment

Support Immigration Reform

AR002899

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5u-ti2p
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1232

Comment Submitted by James Sexton

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## Submitter Information

**Name:** James Sexton

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## General Comment

Any one that fights our President Trump on immigration reforms is not acting in the best interests of our country. If a all possible deport them to San Fransisco.

AR002900

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5v-wjbl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1233

Comment Submitted by Robert Olson

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## Submitter Information

**Name:** Robert Olson

**Address:**

3328 Prospect St. NW  
Washington, 20007

**Email:** rolsonssm@aol.com

**Phone:** 202 320 0193

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## General Comment

As a retired Politico/Military Officer in Department of Defense I think that increased delay is contrary to National Security Interests. In the notice, USCIS makes frequent reference to a rise in national security threats as a reason to spend more time and resources on each decision. However, USCIS has reported that it has been able to decide over 99% of EADs within the 30-day timeframe for over the past year. Therefore, USCIS has proven its ability to adequately vet the amount of requests in a timely fashion. Moreover, its argument regarding increased threats serves only to prompt the need for a speedier process to properly protect national security, rather than its request to delay the process further. This need for a speedier process is further compounded by the fact that the EAD applicants are asylum-seekers already residing in the United States. If vetting must be done to prevent security risks, then having unvetted people in the U.S. subjected to a potentially indefinite review period seems contrary to the departments stated interests.

AR002901

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 06, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d5x-7qb8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1234

Comment Submitted by Rudolph Krall

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## Submitter Information

**Name:** Rudolph Krall

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## General Comment

When are you going to get the Democrats in Congress to get off there asses and do something for America instead of for themselves.

AR002902

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d68-2vov
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1235

Comment Submitted by Margaret Dumas

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## Submitter Information

**Name:** Margaret Dumas

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## General Comment

Help President Trump secure Americas safety by removing the arbitrary bureaucratic timeline. Immigration reform must be put into effect for the good of all. Red tape nonsense continues to create an unsafe United States.

AR002903

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-mcun
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1236

Mass Mail Campaign 4: Comment Submitted by Kathryn Weber (Total as of 11/13/2019: 38)

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## Submitter Information

**Name:** Kathryn Weber

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## General Comment

I have been practicing immigration law for the last 15 years and represent numerous asylum seekers in their journey to live free from persecution. It is essential that asylum seekers have the right to work in the United States. The administrative should not remove the 30-day timeframe to adjudicate employment authorization applications.

Delays in asylum seekers getting their work authorization (Employment Authorization Document or "EAD") approval can lead to:

- Lost income to the asylum seeker and their family
- Food insecurity
- Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID.
- Risk of homelessness/housing insecurity
- Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify)
- Vulnerability to exploitation, trafficking, and underground economy risks
- Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income)
- Loss of ability to support themselves and their families
- Feelings of fear, desperation, and overall mental health concerns

Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable

AR002904

to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

In the notice, USCIS makes frequent reference to a rise in national security threats as a reason to spend more time and resources on each decision. However, USCIS has reported that it has been able to decide over 99% of EADs within the 30-day timeframe for over the past year. Therefore, USCIS has proven its ability to adequately vet the amount of requests in a timely fashion. Moreover, its argument regarding increased threats serves only to prompt the need for a speedier process to properly protect national security, rather than its request to delay the process further. This need for a speedier process is further compounded by the fact that the EAD applicants are asylum-seekers already residing in the United States. If vetting must be done to prevent security risks, then having unvetted people in the U.S. subjected to a potentially indefinite review period seems contrary to the departments stated interests.

This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-ovlq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1237

Comment Submitted by Kellie Lego

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## Submitter Information

**Name:** KELLIE LEGO

**Address:**

10632 little patuxent parkway

suite 406

columbia, MD, 21044

**Email:** kellie@mvplg.com

**Phone:** 2403089991

**Fax:** 2403900603

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## General Comment

Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

AR002906

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-2r8z
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1238

Mass Mail Campaign 13: Comment Submitted by Jillian Wagman (Total as of 11/13/2019: 4)

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## Submitter Information

**Name:** Jillian Wagman

**Address:**

1861 Bay Road

East Palo Alto, CA, 94303

**Email:** jwagman@clsepa.org

**Phone:** 6503910372266440

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## General Comment

This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

AR002907

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-rexd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1239

Comment Submitted by Marisa Muller

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## Submitter Information

**Name:** Marisa Muller

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## General Comment

People in the U. S. LEGALLY should be able to get the work permit quickly. Why should we punish those who want to work and contribute and are legally entitled to a work permit.

AR002908

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-i6fn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1240

Comment Submitted by Patrick Taurel

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## Submitter Information

**Name:** Patrick Taurel

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## General Comment

There is simply no good reason to eliminate this regulation and there are many good reasons to keep it in place. USCIS should not make the proposed change because asylum seekers already need to wait 150 days to simply apply for employment authorization, and they, like all other human beings, have to support themselves and their families. Second, allowing them to work benefits the communities in which they live by freeing asylum-seekers to contribute in the best ways they can. Third, allowing asylum applicants to work generates local, state, and federal tax revenue. These are just some of the reasons USCIS should not adopt the proposed regulation.

AR002909

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-wt8k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1241

Comment Submitted by Candy Shearer

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## Submitter Information

**Name:** candy shearer

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## General Comment

Please secure our border and keep Americans safe. I'm tired of the law being ignored for the sake of people here illegally.

AR002910

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-u6s5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1242

Comment Submitted by Terry Chambers

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## Submitter Information

**Name:** Terry Chambers

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## General Comment

Sirs, your rules for our border agents are hamstringing the process! Give these people the time to do thorough checks on their asylum claims. Your rules are causing criminals and other undesirables to enter and suck up our tax dollars. Fix this now.

AR002911

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6g-288p <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1243

Comment Submitted by Deborah Holbrook

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## Submitter Information

**Name:** Deborah Holbrook

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## General Comment

The 30-day deadline to assess aslyum seekers is too short. It is hindering the vetting process for immigrants,causing officials to cut corners. The safety of our citizens is at stake. Please make proper vetting a priority.

AR002912

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-f3lo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1244

Comment Submitted by Colleen Beebe

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## Submitter Information

**Name:** Colleen Beebe

**Address:**

600 Nicollet Avenue South

Suite 390A

Minneapolis, MN, 55402

**Email:** colleen.beebe@vlmn.org

**Phone:** 6127526670

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## General Comment

The USCIS proposed rule to remove the 30-day processing provision for asylum applicant-related applications for work authorization (I-765) should not move forward. Such a change will be detrimental to the overall asylum system and in contravention of U.S. laws that dictate asylum seekers rights. Ensuring asylum-seekers' request for work authorization are timely processed and approved will improve the asylum system's efficiency. It will enable asylum seekers who are within the law to seek asylum obtain work authorization so that they may be self-sufficient while their asylum applications are pending. It will help to save lives, which is a value we hold in the USA. There is no rationale reason to make this change, which would only harm asylum seekers who have already survived persecution and are simply requesting safe haven in the USA, for which they have a legal right to apply under US law.

AR002913



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-j1cv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1245

Comment Submitted by Robert Baumgardner

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## Submitter Information

**Name:** Robert Baumgardner

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## General Comment

We need to thoroughly check every applicant regardless of a timeline. Too many bad people are here illegally and we do not want more bad actors in legally.

AR002914

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-60cn <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1246

Comment Submitted by Mary Kirkpatrick

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## Submitter Information

**Name:** Mary Kirkpatrick

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## General Comment

You dirty scumm had better support our President Trump's immigration reforms or we'll know just what kind of traitors you are. The losers who want to immigrate will become the scourge of the United States of America.

AR002915

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-fj03
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1247

Comment Submitted by Deborah Williams

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## Submitter Information

**Name:** Deborah Williams

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## General Comment

Please support our President Trump he is trying to make our country safer. I am tired of the political trashing of our President.

AR002916

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-gm2e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1248

Comment Submitted by Margaret Grosso

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## Submitter Information

**Name:** Margaret Grosso

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## General Comment

We need to be able to make sure our borders are safe and only Legal immigrants come into this country. Please listen to President Trump.

AR002917

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-fbhi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1249

Comment Submitted by Jon Hopkins

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## Submitter Information

**Name:** Jon Hopkins

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## General Comment

DO YOUR JOB....This is the UNITED STATES and not some shithole country! Our future is priority and this is what the President is concerned about, among other issues, regarding America! MAGA/KAG.

AR002918

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-lfyy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1250

Comment Submitted by Javier Villacorta

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## Submitter Information

**Name:** Javier Villacorta

**Address:**

1208 S. 10th Street  
Tacoma, WA, 98405

**Email:** alejandro@villacortalawps.com

**Phone:** 2533559926

---

## General Comment

Providing Employment Authorization Documents to those that are awaiting for their asylum claims to be processed is common sense public policy. Keep my car insurance low by allowing asylum seekers in the United States able to have an identification to have a driver's license. Keep our labor laws strong by providing work permits to those that need to work while awaiting for their applications to be completed, allow them to participate in the tax base instead of creating an underclass that helps no one. Just common sense.

AR002919

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-11pb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1251

Comment Submitted by Eugene Dandrea

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## Submitter Information

**Name:** Eugene Dandrea

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## General Comment

America and Americans love immigrants! Immigration is essential for growth!  
However, "proper vetting" is essential for social and economic security!  
National Security.  
Support the President with meaningful rule making.

AR002920

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-ojfb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1252

Comment Submitted by Patricia Beals

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## Submitter Information

**Name:** Patricia Beals

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## General Comment

Please support our President Trump in building the wall and implementing pro-American immigration legislation. American citizens should b first on any agenda to improve this country.

AR002921



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-8jk0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1253

Comment Submitted by Charles Hicks

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## Submitter Information

**Name:** Charles Hicks

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## General Comment

Dear Seator or Representative,

Your action on proposed immigration issues, please pass bills to make our borders safer and allow our border officials to do their jobs uncumbered by political views.

AR002922

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-jq3c
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1254

Comment Submitted by Janice Matthews

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## Submitter Information

**Name:** Janice Matthews

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## General Comment

Stop the immigration constraints/ timeline to help Pres Tump make America safe

AR002923

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-noie
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1255

Comment Submitted by Michael Long

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## Submitter Information

**Name:** michael long

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## General Comment

Let's get on the ball and fix this immigration problem it's been going far to long and we the people are feed up with talk and nothing being done.

AR002924

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-9lyz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1256

Comment Submitted by Carol Carni

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## Submitter Information

**Name:** Carol Carni

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## General Comment

Please support President Trumps immigration reform! This has been in the works for a long time! There is no reason for this hold up! Lets get this done now!

AR002925

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-tv3h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1257

Comment Submitted by Ronald Haas

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## Submitter Information

**Name:** Ronald Haas

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## General Comment

It's a must to thoroughly check the background of every asylum seeker entering our country, anything less is putting our citizens and country at risk. The same goes for any immigrant entering out country.

AR002926

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-egz0 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1258

Comment Submitted by Edward Ptero

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## Submitter Information

**Name:** Edward Ptero

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## General Comment

Under who's authority are they able to set ANY deadlines , concerning our immigration policies ?

AR002927

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-g1f9 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1259

Comment Submitted by John Farnsworth

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## Submitter Information

**Name:** John Farnsworth

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## General Comment

Please in the name of God put Americans first !!!

AR002928

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-f4m2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1260

Comment Submitted by Russell Griffin

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## Submitter Information

**Name:** Russell Griffin

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## General Comment

Sen. Scott  
Sen Rubio  
Rep. Soto

AR002929



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-lmsv <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1261

Comment Submitted by James Rokowski

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## Submitter Information

**Name:** James Rokowski

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## General Comment

Support President Trump's Immigration Reforms! Stop illegal immigration. Build the wall.

AR002930

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-a0wh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1262

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

This proposed change is a ridiculous and disgusting attempt at disenfranchising asylum seekers with longer wait times in a very clearly politically motivated move. Removing the 30-day processing provision would have a long list of detrimental consequences such as poverty, homelessness, causing some individuals to turn to crime in desperation, and losing a substantial amount of tax revenue from individuals who simply want to live safely in the US.

AR002931

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-lbjh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1263

Comment Submitted by Bobbie Hill

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## Submitter Information

**Name:** Bobbie Hill

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## General Comment

Support President Trumps immigration reforms

He is a wise and brave President!!

AR002932

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-zjh4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1264

Comment Submitted by Robert Williams

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## Submitter Information

**Name:** Robert Williams

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## General Comment

Who are these people, have the American people gone insane. Illegals don't belong here and if you don't like it you can go back with them. PERIOD

AR002933

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-hcal <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1265

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am a member of Holy Trinity Parish in Georgetown. Our parish has been sponsoring and supporting Asylum Seekers. Please do not remove the 30-Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications. It will cause unfair and undue hardship for Asylum Applicants and those who support them.

AR002934

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-yasz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1266

Comment Submitted by Alexandra Schneider

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## Submitter Information

**Name:** Alexandra Schneider

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## General Comment

My name is Alexandra Schneider, I am an attorney and co-founder of Meadowlark Immigration PC in Portland, Oregon. Our office serves hundreds of clients in the process of applying for asylum.

Elimination of the 30-day EAD rule will be devastating to those fleeing persecution because they will not be able to work and support their families, access resources, or obtain drivers licenses. But putting aside the fact that this will harm the most vulnerable and is not in the humanitarian interest, this is also harmful to the country as a whole. When people have the ability to work, they are able to participate in our economy and pay taxes, which is crucial to propelling our economy.

Another solution to this problem would be to allow asylum seekers to submit their EAD applications earlier than 150 days, thus giving USCIS more time to process the application before the 180 days from submission.

Every month that one of my clients is unable to work or get a drivers license means that they are falling further into hardship, unable to feed or house their children, and are more likely to need the support of the government and non-profit resources. What I know is that my clients do not want to do that. They want to work, and the longer they have to wait, the more detrimental it is for all.

AR002935

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-mt27
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1267

Comment Submitted by David Galloway

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## Submitter Information

**Name:** David Galloway

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## General Comment

Please get off the sidelines and support Trump fighting this impeachment fiasco.

AR002936

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6g-2shm <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1268

Comment Submitted by Patricia Milligan

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## Submitter Information

**Name:** Patricia Milligan

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## General Comment

Given the massive assault on our borders, it is imperative that all individuals be full vetted. This country welcomes people who do it the right way, follow our laws and look forward and are prepared to contribute positively to our society. It is time to use common sense as well as DO YOUR JOB!

AR002937



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-q2rl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1269

Comment Submitted by Anonymous Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The 30-day processing provision should remain in effect. From a humanitarian standpoint, asylum-seekers are the most vulnerable class of people coming to the United States. They need to work to support themselves through the processes. In return, business owners will have reliable motivated employees to help their businesses. Further, the US government will gain tax revenue from their income. Once an asylum seeker files for asylum, they submit biometrics that are used to check their backgrounds. As they may not apply for employment authorization for 150 days, the background checks will certainly be completed even before they apply for their employment authorization. There is no rational need to remove the 30-day processing provision to complete background checks, when the checks would have already been completed. America has always been a country that treated people humanely and with dignity. Providing an employment authorization in a timely matter is a mechanism to allow asylum-seekers to help themselves.

AR002938

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-ymwj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1270

Comment Submitted by Peggy Waddington

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## Submitter Information

**Name:** Peggy Waddington

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## General Comment

I am requesting you to support President Trump's immigration reform

AR002939

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-1xso
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1271

Comment Submitted by Kendra Scheuerlein

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## Submitter Information

**Name:** Kendra Scheuerlein

**Address:**

70 w madison st, ste 4000

c/o Hughes Socol Piers Resnick & Dym

Chicago, IL, 60602

**Email:** kscheuerlein@hsplegal.com

**Phone:** 3126042624

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## General Comment

The 30 day processing provision for first time applicants for employment authorization based on a pending asylum application is very necessary, as it allows people to support their families, paying for their housing, food and bills and contribute to our social security and income tax systems, which assists all people in the US. Without employment authorization, asylum seekers will lose the ability to support themselves and their family, they will be unable to contribute to our tax revenue, and they will be unable to obtain IDs and driver's licenses, which actually makes communities much more healthy and safe.

AR002940

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6g-xd8c <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1272

Comment Submitted by Gary Roberts

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## Submitter Information

**Name:** Gary Roberts

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## General Comment

We truly support President Trumps Immigration Reforms. Mexico has been working with the US thanks to President Trump. We MUST protect our borders and stop drugs, illegal criminals, and diseases that could affect our entire country and especially our children. We stand behind President Trump 100%. Thank you for all you do for America.

AR002941

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-8z72
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1273

Comment Submitted by Jan Gorton

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## Submitter Information

**Name:** Jan Gorton

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## General Comment

You fully vet gun ownership but for our safety , you dont vet I  
Immigrants. Why??

AR002942

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-5zp4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1274

Comment Submitted by Gay Pasley

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## Submitter Information

**Name:** Gay Pasley

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## General Comment

Please do not remove the 30 day Processing Provision for Asylum Applicant Related Form I-765 /Employment Authorization Applications. You are denying this country highly skilled asylum seekers and costing our economy.

AR002943

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-177z
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1275

Comment Submitted by Debra Gauthier

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## Submitter Information

**Name:** DEBRA GAUTHIER

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## General Comment

Stop playing politics and support President Trump's Immigration Reforms. We hired you to do a job not waste our tax dollars.

AR002944

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-sye3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1276

Comment Submitted by Marjorie Berg

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## Submitter Information

**Name:** Marjorie Berg

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## General Comment

please follow the lead of President Trump I feel he has the country's best interest at heart and always does

AR002945



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-h5pw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1277

Comment Submitted by Suzanne Sporri

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## Submitter Information

**Name:** Suzanne Sporri

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## General Comment

I am very much against this proposed rule. This country was formed as a nation of immigrants- many seeking safely, peace and freedom just like the asylum seekers entering today. The statue of liberty is a symbol of our identity as a country. We cannot forget this. Asylum seekers already need to wait 180 days to get an EAD. This is extremely difficult. How can someone pay their rent, buy food and of course pay for therapists and doctors to overcome their trauma if they cannot work legally? This makes no sense. These people do not want to take advantage of our services. They want to work, but this rule will make this even more difficult for them. Do not approve this change.

AR002946

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-8ont <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1278

Comment Submitted by Louise Roach

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## Submitter Information

**Name:** Louise Roach

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## General Comment

tell the democrats to stop lying

AR002947

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-1812
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1279

Comment Submitted by Rochelle Williams

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## Submitter Information

**Name:** Rochelle Williams

---

## General Comment

Secure the USA!!! Do not let ANYMORE unchecked and possible terrorists in our country without a background check! BUILD THE WALL! I am all for letting people become citizens, but I do not like people just "dumped into our country" without knowing who and what they are.

AR002948

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-c426
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1280

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Keep the 30 day deadline for work authorization. Asylum seekers need to have stability and having their cards processed timely helps their families and communities at large. People fleeing danger already have to wait 150 days to file for work authorization, keeping a 30 day deadline to issue the cards reduces uncertainty and eases people into the work force sooner.

AR002949

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-e9go
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1281

Comment Submitted by Deborah Sosa

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## Submitter Information

**Name:** Deborah Sosa

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## General Comment

I want to be safe . Make sure we know exactly who is coming into our country and that they are not terrorists or tied to terrorism in any way .Take time to investigate.

AR002950

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-ci6p
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1282

Comment Submitted by Bobby Vick

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## Submitter Information

**Name:** Bobby Vick

---

## General Comment

I respectfully request that President Trump be allowed to proceed with his immigration reforms and stop the current, ridiculously easy entry policy for immigrants presently wanted by democrats. Please allow President Trump to secure our borders and stop illegal immigration.

AR002951

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6g-pe60 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1283

Comment Submitted by Rose Garrett

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## Submitter Information

**Name:** Rose Garrett

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## General Comment

National security requires adequate time spent to thoroughly vetting every asylum seeker in order to protect from cartels trafficking drugs and human beings into USA

AR002952

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-t86a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1284

Comment Submitted by Caroline Lindstrom

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## Submitter Information

**Name:** Caroline Lindstrom

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## General Comment

PLEASE HELP PRESIDENT TRUMP SECURE AMERICA'S SAFETY BY REMOVING THIS ARBITRARY TIMELINE.

AR002953



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-p9we
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1285

Comment Submitted by Lindsay Marois

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## Submitter Information

**Name:** Lindsay Marois

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## General Comment

Asylum applicants are already authorized to be in the United States for humanitarian reasons, and once the initial wait period is over, have a legal basis to seek employment authorization. It serves no purpose to delay providing that authorization and, in fact, hinders US interests by eliminating potential tax revenue that could be received from these applicants. The policy of the United States government should seek to receive a benefit from those authorized to be in the United States in the form of tax revenue, rather than creating large classes of people who would like to, but are legally unable to, support themselves.

AR002954

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-11f4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1286

Comment Submitted by Colin O'Brien

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## Submitter Information

**Name:** Colin O'Brien

**Address:**

1411 NE Highland St.

Portland, OR, 97211

**Email:** colin@jgonzaleslaw.com

**Phone:** 6504921399

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## General Comment

As a practicing immigration attorney, I have direct experience representing asylum seekers before USCIS and EOIR. Asylum seekers are not criminals and are not coming here to work. No one willingly leaves their home and their families. Asylum seekers are coming to escape persecution and are afforded due process rights to present their case under binding domestic and international laws. They need work authorization in able to support themselves while their cases remain pending. Otherwise, they will be forced to work without authorization and be unable to obtain basic necessities, such as driver licenses or a place to live. I have had asylum cases pending before EOIR for 5 years and before USCIS for 3 years without an interview. Unless the DOJ and DHS do something to decrease the case backlog, DHS should continue to grant EADs to asylum seekers while their cases remain pending so that they may survive.

Our country is better than this.

AR002955

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-tq46
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1287

Comment Submitted by Valerie Trowe

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## Submitter Information

**Name:** Valerie Trowe

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## General Comment

Time is needed to fully vet all those who have crossed our borders illegally. We need to keep our country safe & available to those who want to be Americans.

AR002956

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-ypxf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1288

Comment Submitted by Micaela Alvarez

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## Submitter Information

**Name:** Micaela Alvarez

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## General Comment

Asylum seekers are coming to our country to seek refuge. We should give them the opportunity to work because their asylum interview may not be adjudicated for years. Without the means to work, we are forcing asylees into poverty. The proposed change is unfair and inhumane. Please do not change the current 30-day processing regulation.

AR002957

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-sp08
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1289

Comment Submitted by Mike Kennelley

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## Submitter Information

**Name:** Mike Kennelley

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## General Comment

You need to get behind our elected president and end this ridiculous time line to check on applicants. More time is required to make sure these individuals are to be resident's in our country. Do your elected job protecting us.

AR002958

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-z5uq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1290

Comment Submitted by Laura Jennings

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## Submitter Information

**Name:** Laura Jennings

**Address:**

5714 E 104th Pl  
Tulsa, OK, 74137

**Email:** laura.jennings@schafferherring.com

**Phone:** 469-583-4094

**Fax:** 918-550-8106

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## General Comment

I am a member of the private immigration bar licensed in three states. I do not support the removal of the 30-day requirement to process initial EADs for asylum seekers within 30 days. I have many clients who are struggling to support themselves without work authorization, so the 150-day wait to submit a work permit application is already a burden to them. As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant

AR002959

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-uhz7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1291

Comment Submitted by Donna Decristofaro

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## Submitter Information

**Name:** Donna Decristofaro

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## General Comment

Close the border if we have to. Until we get better help to secure it. Make the Democrats tow the right thing to do.

AR002960

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-4stq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1292

Comment Submitted by Suzanne StJohn

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## Submitter Information

**Name:** Suzanne StJohn

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## General Comment

Follow the commands of our POTUS as his wisdom is profoundly beneficial to our great Nation.

AR002961



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-7it4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1293

Comment Submitted by Ruth OBryan

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## Submitter Information

**Name:** Ruth OBryan

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## General Comment

I support President Trump and his efforts to secure our borders and to make sure those who want to come here are not terrorists and have skills that will be beneficial to the country and not be a burden to our country.

Please support his efforts for change in the broken immigration system.

AR002962

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-w398
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1294

Comment Submitted by Cecelia Gepp

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## Submitter Information

**Name:** Cecelia Gepp

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## General Comment

Please help the President help the American citizens to stay safe by building the wall and quit putting restrictions on him every time he turns around.....we the people want our country safe! We wouldn't be having all this trouble had the Democrats not advocated for all these people to storms our borders!

AR002963

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-2vac
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1295

Comment Submitted by Carmen Maria Rey

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## Submitter Information

**Name:** Carmen Maria Rey

**Address:**

250 Joralemon St.

Brooklyn, NY, 11201

**Email:** carmenmaria.rey@brooklaw.edu

**Phone:** 718.780.0338

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## General Comment

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application.

If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

The proposed regulation will have theno doubt unintendedeffect of forcing asylum seekers to choose between working without authorization in the underground economy or relying on state-funded public benefits to survive. Both options will necessarily result in negative economic effects, including lost tax revenue and overtaxed social safety nets. USCIS convenience is important, but as there is an equally logical way to ensure that USCIS has sufficient time to adjudicate petitions without harming the countrys economy, the proposed regulation must be modified.

AR002964

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-58fl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1296

Comment Submitted by Sue Christian

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## Submitter Information

**Name:** Sue Christian

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## General Comment

Do the right thing----support our President's immigration reforms--unless of course you are a closet Communist hiding in "socialist clothing".

AR002965

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-ud52
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1297

Comment Submitted by Marilyn Belle

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## Submitter Information

**Name:** Marilyn Belle

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## General Comment

PLEASE, PLEASE, PLEASE SUPPORT PRESIDENT TRUMP'S IMMIGRATION REFORMS ... AMERICAN CITIZENS SHOULD COME FIRST PLUS WE NEED TO THINK OF OUR VETERANS, POOR AND HOMELESS. UNITED STATES OF AMERICA CAN'T TAKE CARE OF EVERYONE WHO COMES HERE ILLEGALLY!!!!

AR002966

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-3qyu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1298

Comment Submitted by Abigail Nyberg

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## Submitter Information

**Name:** Abigail Nyberg

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## General Comment

I am writing to oppose the elimination of the 30-day deadline for the processing of initial asylum EADs. Asylum seekers live in the United States while they wait for their cases to process, and preventing them from working hurts everyone. It hurts the US due to a loss of tax revenue that would be taken from the paychecks of legally working asylum seekers, an increase in the number of people who are unemployed and living in poverty, and in the increased stress on systems which help people in need. It is completely unnecessary and cruel to prevent people from working and providing for their families.

AR002967

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-ovvn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1299

Comment Submitted by Shelly Luna

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## Submitter Information

**Name:** Shelly Luna

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## General Comment

Please allow for proper vetting of any people seeking admission to the USA, enough time to background check and investigate is essential to the safety of all residents of the USA. We are looking to you and voting accordingly. Thanks for your time and consideration.

AR002968

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-j781 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1300

Comment Submitted by Eva Wailes

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## Submitter Information

**Name:** Eva Wailes

**Address:**

3019 Minnehaha Ave.  
Minneapolis, 55406

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## General Comment

Asylum seekers are acting under the law to have their claims assessed by immigration authorities. To remove the 30 day deadline to process employment authorization documents means they will need to retreat to other potentially unauthorized means to live and feed themselves and their families.

It means food insecurity for families and children. It means more backlog in an already clogged immigration system. It means encouraging immigrants to go around legal means and use illegal means to be in the US. It is bad all around. This change should not be made.

AR002969



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-3x2o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1301

Comment Submitted by Barbara Cook

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## Submitter Information

**Name:** Barbara Cook

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## General Comment

I would appreciate it if you would like support President Donald J Trump's immigration reform bill. We need to make sure that every illegal immigrants is safe to come across our Southern Border to enter our country and that our communities and country is safe from these illegals coming into our country and not bringing any gang member's and their violence with them. Please, support President Donald J Trump's immigration reform bill!! I'm requesting your presence and your support!

AR002970

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-mjd4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1302

Comment Submitted by Dan Markham

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## Submitter Information

**Name:** Dan Markham

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## General Comment

Please extend the timeline from 30 days to 90 days to ensure a thorough background check on each asylum seeker to the United States. This is important to ensure the safety of all U.S. citizens.

AR002971

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-kr5g
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1303

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

It is important to keep the 30-day processing provision for asylum applicants. The applicants already face a 5 month delay to apply for (not receive) work authorization. They need the 30-day processing provision in order to begin their lives while they wait for an interview, which can take up to 4 years. Applicants seeking protection frequently do not have unlimited funds to start over in the U.S. or to secure legal representation. They frequently come to the U.S. under dire circumstances and must quickly leave their homelands. They use whatever resources to file for asylum, and this frequently means paying for assistance to complete forms in English when they are native speakers of other languages. Asylum law is complex and legal assistance is required to articulate complex claims involving evolving areas of the law. Not providing vulnerable asylum applicants with work authorization after six months of waiting condemns them to applying for protection when their lives are at risk without assistance, thereby effectively depriving them of any chance of protection. The asylum laws of the US are in place due to our international treaty obligations and because this country used to be a moral leader in human rights and has a century-old tradition of providing the opportunity to apply for protection to persons needing refuge because they face harm due to characteristics they possess, but they cannot change. Elimination of the 30-day rule would drastically undermine the purpose of the asylum laws and the U.S.'s ability to honor its treaty obligations.

AR002972

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-l4ky
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1304

Comment Submitted by David Bliven

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## Submitter Information

**Name:** David Bliven

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## General Comment

As our Representative's you need to focus on Securing our Nation. Border needs to be enforced & immigrants fully investigated. Stop wasting our money on none Citizens. Reduce the National Debt.

AR002973

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-yxsZ
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1305

Comment Submitted by John Meyer

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## Submitter Information

**Name:** John Meyer

---

## General Comment

Close the border for National security. Untill Imigration is fixed so that all can only enter via a legal portal being adequately vetted for entry and past criminal history. Stop the cartels from their drug infiltration and trafficking of illegal drug mules and sex offenders and trafficking in slaves to sex abusers.

AR002974

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-9ijr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1306

Comment Submitted by Kathleen Korniyenko

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## Submitter Information

**Name:** Kathleen Korniyenko

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## General Comment

Removal of this rule is dumb and pointless. People who have applied for asylum should absolutely be able to receive work permits in order to work legally. By working legally, asylum-seekers will pay taxes and pay into social security, etc. Asylum seekers will also not be as reliant on government help or non-profit organizations. It benefits everyone if asylum seekers can quickly receive their work permits. I am strongly opposed to removing this rule.

AR002975

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-v82a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1307

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This rule will harm asylum seekers who have a legal right to come to the US for protection. Please do not implement this rule.

AR002976

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6g-7a6v <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1308

Comment Submitted by Jeannie Luttrell

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## Submitter Information

**Name:** Jeannie Luttrell

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## General Comment

Remove arbitrary timelines and help PRESIDENT TRUMP fully vet all who enter U.S. borders.

AR002977



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-74mr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1309

Comment Submitted by Mark Frazier

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## Submitter Information

**Name:** Mark Frazier

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## General Comment

Support immigration reform, build the security wall to lessen the spaces to be covered by our over stretched BORDER PATROL agents.

AR002978

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1310

Comment Submitted by Morrie Nourian

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## Submitter Information

**Name:** Morrie Nourian

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## General Comment

Not granting work permits to asylum seekers is counter productive, inhumane, and contrary to international law obligations of the US.

russian and ukranian trolls want you t0o believe otherwise but do not fall pray to foreign influences. uphold the law and it will benefit the US as these people will become income producing families contributing to our over all economy, internal revenue income and use less government benefits once the are able to work, and live legally versus going underground and not paying taxes, or have insurance, or use the welfare, and other state and federal subsidies.

it is the right thing to do.

AR002979

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1311

Comment Submitted by Daniel Scruggs

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## Submitter Information

**Name:** Daniel Scruggs

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## General Comment

No timelines for illegals or legal that are seeking asylum. Your making our country less safe now do your jobs!

AR002980

# PUBLIC SUBMISSION

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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1312

Comment Submitted by Marilyn Vailati

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## Submitter Information

**Name:** Marilyn Vailati

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## General Comment

The invaders are destroying the UNITED STATES in every way possible. Namely disease and outrageous crime and initially breaching the law with phony asylum requests.

AR002981

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1313

Comment Submitted by Juliet Stumpf

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## Submitter Information

**Name:** Juliet Stumpf

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## General Comment

Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks.

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

USCIS has reported that it has been able to decide over 99% of EADs within the 30-day timeframe for over the past year. USCIS has proven its ability to adequately vet the amount of requests in a timely fashion. This need for a speedier process is further compounded by the fact that the EAD applicants are asylum-seekers already residing in the United States. If vetting must be done to prevent security risks, then having unvetted people in the U.S. subjected to a potentially indefinite review period seems contrary to the departments stated interests.

By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

Proposed Alternative: As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each

AR002982

request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR002983

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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1314

Comment Submitted by Patrick ORourke

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## Submitter Information

**Name:** Patrick ORourke

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## General Comment

Help Americas safety by removing this arbitrary bureaucratic timeline on President Trump's Immigration reforms!!

AR002984

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<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-z3i4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1315

Comment Submitted by Roger Betcher

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## Submitter Information

**Name:** roger betcher

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## General Comment

Quick playing the political BS and do something regarding the immigration reform.

AR002985



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-qf61
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1316

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Eliminating the 30 day EAD processing regulation for asylum seekers will not only harm asylum applicants, but will also harm the United States, as it will reduce tax revenues. Asylum applicants are already a vulnerable population; restricting their access to work authorization will cause them additional hardship in supporting their families.

AR002986

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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-uhno
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1317

Comment Submitted by Douglas Grahf

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## Submitter Information

**Name:** Douglas Grahf

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## General Comment

We must know who is who within all facets of immigration in the US. Just like we are born as a US citizen we know who each person is.

AR002987

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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1318

Comment Submitted by Alexandra Matusinka

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## Submitter Information

**Name:** Alexandra Matusinka

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## General Comment

You have a responsibility to protect the American people who support this country before considering people who break into our home (America). Give our President the time he needs to process thoroughly those who want to come to our home!!

AR002988

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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-x33k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1319

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Keep the 30 day processing rule.

As an immigration attorney, I see asylum seekers who come here with nothing and have to work to support themselves or family. Removal of the 30 day rule is cruel and unnecessary. They want to work legally and pay taxes. They do not want to be a public charge. There is no reason that the 30 day rule cannot be followed, except as a punitive measure or way to dissuade asylum seekers. removal of 30 day processing is purely partisan and not in the best interest of the US.

AR002989

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1320

Comment Submitted by Judy Flanagan

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## Submitter Information

**Name:** Judy Flanagan

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## General Comment

I am an attorney who has practiced immigration law for 21 years. I regularly represent asylum seekers and daily see the harm that delays in work permits cause to my clients and their families. My clients lose jobs and the ability to feed their families when USCIS delays their work permits. Taking away the 30 day processing rule after clients have already had to wait 150 days to apply for a work permit (and usually after waiting months more before this to put together a well-prepared asylum application) is simply unfair and extremely mean spirited.

In Arizona, if my clients don't have a work permit, they can't get a Social Security number and they can't get a driver's license. This is critical to prevent homeless, food insecurity, and the ability to access social services. It makes no sense as a matter of public policy to have unlicensed drivers out there. This proposal is a very slippery slope.

Many asylum seekers have been subjected to great trauma in their home country, both physical and psychological. Having yet another roadblock to helping them get on their own two feet just adds to the stress and anxiety that they are experiencing. This proposal is bad for asylum seekers and it's bad for Americans. It was short-sighted of Congress to make asylum seekers wait 5 months to get a work permit, but it adds insult to injury to have USCIS propose that they shouldn't have to process I-765 applications in a timely fashion. It's clear the agency has the ability to do get work permits out promptly because they've been doing it under court order. There's really no valid basis for this new proposal; it appears to be just a way of putting more roadblocks in the path for asylum seekers because of the current Administration's ideological bent.

I would note that in the last three years, I have seen an exponential increase in non-delivery of work permit cards by USCIS despite having provided USCIS with the correct delivery address. Getting a card re-delivered to a client is often taking six months or more. Given this reality, this new proposal to eliminate the 30 day processing time period would mean even longer delays in getting authorization to work, which is authorized under U.S. statutes. I strongly object to this proposed regulation and urge that you reject it.

AR002990

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1321

Comment Submitted by RaeEllen Dickey

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## Submitter Information

**Name:** RaeEllen Dickey

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## General Comment

PLEASE SUPPORT PRESIDENT TRUMP'S POLICY ON IMMIGRATION LAWS.

AR002991

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1322

Comment Submitted by Charlene Saunders

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## Submitter Information

**Name:** Charlene Saunders

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## General Comment

Our country is being overrun with illegal immigrants. Our government needs time to thoroughly do a background check before releasing into this country.

AR002992

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1323

Comment Submitted by Sheafe Ewing

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## Submitter Information

**Name:** Sheafe Ewing

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## General Comment

Immigration Reform is of urgent necessity. Get on with it, using President Trump's reforms. Enough of the game-playing in Washington..... NO vacations until the work gets DONE.

AR002993



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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1324

Comment Submitted by Jeanette Kain

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## Submitter Information

**Name:** Jeanette Kain

**Address:**

50 Congress Street

Suite 200

Boston, MA, 02109

**Email:** jeannie@ramirezkain.com

**Phone:** 617-545-4804

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## General Comment

I am an immigration lawyer in Boston, MA and I am writing to oppose this regulation. Employment authorization is essential to an asylum seeker's ability to support herself and assimilate into the community. Asylum seekers are already required to wait 180 days after filing their asylum application before they can even apply for employment authorization. Removing the 30 day processing time will cause even further delays. For other categories of employment authorization, we are currently seeking 6-9 months delays (and in some cases, even longer delays). Asylum seekers are of the most vulnerable of immigrants in the U.S. and setting up additional road blocks to employment authorization increases their vulnerability.

Delays in employment authorization can lead to:

- 1) Lost income to the asylum seeker and their family
- 2) Food insecurity
- 3) Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID.
- 4) Risk of homelessness/housing insecurity
- 5) Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify)
- 6) Vulnerability to exploitation, trafficking, and underground economy risks
- 7) Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income)

AR002994

- 8) Loss of ability to support themselves and their families
- 9) Feelings of fear, desperation, and overall mental health concerns

There is also a national security issue here - a speedier process to adjudicate employment authorization properly protects our national security. Adding additional delays to the process threatens our security.

Finally, if USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

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<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-2li6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1325

Comment Submitted by Ronald Fyffe

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## Submitter Information

**Name:** Ronald Fyffe

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## General Comment

Let Trump immigration continue/ it's the best method

AR002996

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1326

Comment Submitted by Anonymous Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Let asylum seekers work! Per national and international law, individuals who have experienced or fear harm in their countries of origin have a right to seek asylum in the US, and no Trumpian administrative or executive action will change this fact.

Most asylum seekers fleeing strife and violence do not come with resources to support themselves and their families indefinitely. Under existing law, asylum seekers are already required to wait at least 6 months after entry to get a work permit, creating considerable financial hardship to most applicants, and many applicants never become eligible for work permits, but this does not deter people fleeing harm and death from coming.

Eliminating the EAD adjudication deadline will not deter asylum applicants from seeking refuge in the U.S. They will still come, so lets allow them to support themselves while here.

AR002997

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<b>Tracking No.</b> 1k3-9d6g-i3ku
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1327

Comment Submitted by Carlos Soprano

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## Submitter Information

**Name:** Carlos soprano

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## General Comment

We need Immigration Reform now ,

AR002998

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1328

Comment Submitted by Brian Benson

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## Submitter Information

**Name:** Brian Benson

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## General Comment

Good afternoon,

As a citizen of these United States I am formerly requesting that President Trumps immigration reforms be supported by each member in Washington. Its time to stop playing politics and start protecting Americans. I voted for President Trump because of his promises and policies on immigration reform. This needs to get done.

Kind regards,  
Brian J. Benson

AR002999

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1329

Comment Submitted by Lynn Neugebauer

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## Submitter Information

**Name:** Lynn Neugebauer

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## General Comment

November 7, 2019

Dear Sir or Madam,

I want to comment on the proposed regulation where USCIS gives itself more than 30 days to adjudicate asylum seekers EAD cards.

I am an attorney with a non-profit organization and have more than 30 years of immigration law experience. In the notice, USCIS makes frequent reference to a rise in national security threats as a reason to spend more time and resources on each decision. However, USCIS has reported that it has been able to decide over 99% of EADs within the 30-day timeframe for over the past year. Therefore, USCIS has proven its ability to adequately vet the amount of requests in a timely fashion. Moreover, its argument regarding increased threats serves only to prompt the need for a speedier process to properly protect national security, rather than its request to delay the process further. This need for a speedier process is further compounded by the fact that the EAD applicants are asylum-seekers already residing in the United States. If vetting must be done to prevent security risks, then having unvetted people in the U.S. subjected to a potentially indefinite review period seems contrary to the departments stated interests.

This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be

AR003000

more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

Sincerely,

Lynn Neugebauer

NY NY 10001

AR003001



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1330

Comment Submitted by Margaret Kehrt

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## Submitter Information

**Name:** margaret kehrt

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## General Comment

I support your immigration plans !!!

AR003002

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1331

Comment Submitted by Richard OKeefe

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## Submitter Information

**Name:** Richard OKeefe

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## General Comment

Wake up Dems and play the game by the rules. Can't stop you from starting the actions but I see how you change the rules to your favor all the time. Make them come through the front door and stop ling.

AR003003

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-380h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1332

Comment Submitted by Manuel Fernandez

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## Submitter Information

**Name:** Manuel Fernandez

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## General Comment

I am writing to advise I support President Trump's immigration reforms whole heartedly. I would urge you to stand behind President Trump and defend our borders. The decisions you are making put my life and my family's life in danger. They are totally unacceptable and irresponsible to the citizens of the United States and put our well being in peril. Your urgent attention is required and demanded of you. You serve US. We DO NOT serve YOU! End this charade NOW!

AR003004

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-wcxf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1333

Comment Submitted by Janice Carter

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## Submitter Information

**Name:** Janice Carter

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## General Comment

I am asking that Washington support President Trumps Immigration Reforms. Give officials time to screen all immigrants fully.

AR003005

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-dv9w
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1334

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Persons seeking asylum are applying the legal way. They need to be able to support themselves while a decision is made on their case. By keeping the processing times for work permits under 30 days, they will be able to work sooner which will help America.

AR003006

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-jzh1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1335

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Implementing the proposed rule to remove the 30-day deadline of processing initial asylum EADs would be harmful to both the asylum seeker and the United States. Asylum seekers are already the most vulnerable of the vulnerable, having fled their home country out of fear of persecution. Providing an EAD with only a 30 day processing time ensures they can promptly become self sufficient. It also provides asylum seekers access to many medical services, a social security number, and being able to apply for a driver's license. Without these benefits, asylum seekers are vulnerable to exploitation.

This proposed rule is also harmful to the United States as a whole, as it would result in an extraordinary loss of revenue.

AR003007

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-yxk8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1336

Comment Submitted by Nick Ingrassi

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## Submitter Information

**Name:** Nick Ingrassi

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## General Comment

As a law enforcement officer in the boarder state of Arizona, I see first hand illegal immigration is doing to our state and communities. The drugs coming in, human trafficking, crimes and more. We must control our borders and vetted those who come here. We support legal immigration just not illegal immigration. Its time to control our boarder.

AR003008

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-dcvc <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1337

Comment Submitted by David Matthes

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## Submitter Information

**Name:** David Matthes

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## General Comment

Support Trump's immigration reform.

AR003009



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-3770
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1338

Comment Submitted by M Marquis

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## Submitter Information

**Name:** M Marquis

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## General Comment

Please support Trump on immigration and secure this country.

AR003010

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-vupk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1339

Comment Submitted by Chester Dobson

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## Submitter Information

**Name:** Chester Dobson

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## General Comment

Please allow the president to do his work to protect the American people.....

AR003011

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-tlyz <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1340

Comment Submitted by Robert von Behr

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## Submitter Information

**Name:** Robert von Behr

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## General Comment

We need to vet all persons, including children, who wish to enter our country. America is our HOME; we have to protect it from intruders. That is why we, the taxpayers, employ you, the government employees. You are our guards, our police force, and we count on YOU to perform that service for us.

AR003012

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-h3iz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1341

Comment Submitted by Glennda Shelton

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## Submitter Information

**Name:** Glennda Shelton

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## General Comment

Please protect our nation by giving our officials time enough to check completely people applying for asylum.. we need people here who truly need asylum and want to be Americans. We do not need people who hate Americans or are here to defeat us.

AR003013

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-6sy7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1342

Comment Submitted by Sarah Molina

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## Submitter Information

**Name:** Sarah Molina

**Address:**

9300 Olive Blvd.

St. Louis, MO, 63132

**Email:** smolina@molinaimmigration.com

**Phone:** 3149955351

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## General Comment

As a nation that welcomes people fleeing persecution, we should not place barriers in front of already vulnerable people. Many asylum seekers are suffering from what occurred to them in their home countries. Being able to pay rent, buy food, hire a lawyer, and pay for mental health care will help reduce the harms that they already experienced. Eliminating the the thirty day period for processing initial EADs would burden charities and non-profits that are already stretched thin. If asylum-seekers are unable to obtain an EAD in a timely manner, they are forced to rely on other forms of support, including organizations that provide financial, housing, legal, or other forms of assistance.

AR003014

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-m9by <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1343

Comment Submitted by Jim Nelson

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## Submitter Information

**Name:** Jim Nelson

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## General Comment

The security of our Country demands proper screening of asylum seekers. 30 days is not enough time to compete this function.

AR003015

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-x1h9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1344

Comment Submitted by Kristin Gray

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## Submitter Information

**Name:** Kristin Gray

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## General Comment

In light of what happened to that poor Mormon family, our borders should be closed. The cartels are destroying Mexico. Thanks to Eric Holder, they are well armed.

AR003016

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-l211
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1345

Comment Submitted by Sabrina Damast

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## Submitter Information

**Name:** Sabrina Damast

**Address:**

510 west 6th Street, suite 330

Los Angeles, CA, 90014

**Email:** [sabrina@sabrinadamast.com](mailto:sabrina@sabrinadamast.com)

**Phone:** 3234758716

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## General Comment

It is essential that individuals who are lawfully pursuing their right to apply for asylum be able to support themselves and their families. They are already required to wait 6 months to obtain a work permit. Adding another 6 months of processing time to that wait is unconscionable.

AR003017



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-hgno
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1346

Comment Submitted by Martha Scheifele

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## Submitter Information

**Name:** Martha Scheifele

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## General Comment

The timeline is dangerous to American citizens.  
Can you pass an executive order to cancel it.

AR003018

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-14c3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1347

Comment Submitted by Rachel Wright

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## Submitter Information

**Name:** Rachel Wright

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## General Comment

I'm writing to oppose the Trump administration's proposal to remove the 30 day timeline for adjudicating asylum seekers' work authorization requests. Beyond simple cruelty to vulnerable immigrants, I can't see a reason for removing this rule.

As the office manager for an immigration attorney, I meet vulnerable immigrants who are fleeing desperate situations every day. They are motivated to better their lives, find work, raise their families in safety, and give back to their community. How does it help our country to keep them from working? We lose the tax revenue, and they lose their ability to find meaning and purpose in their lives, and provide for themselves and their families. Furthermore, without the ability to work, how do we expect these people to "pull themselves up from their bootstraps?"

Cruelty and fear should never be a reason for enacting rule changes or legislation. I am firmly opposed to the abandonment of this rule. Please reconsider.

AR003019

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-uk34
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1348

Comment Submitted by Walter Gross

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## Submitter Information

**Name:** Walter Gross

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## General Comment

When are you going to wake up and start looking out for the people of the USA, get rid of your time line for immigrants coming into the country there is no rush on that, stop allowing criminals into the country because you want to hurry. Need lawmakers that work for the people not for illegals. There going to get voted out next time. (Do nothing Congress) that's what we have! Wake up.

AR003020

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-6s3r
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1349

Comment Submitted by Dennis DeLong

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## Submitter Information

**Name:** Dennis DeLong

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## General Comment

As you are aware, our border is in need of fortification in order to properly vet those coming to it. Please give our brave men and women the resources and necessary time to vet assylum seekers. We in the heartland are becoming increasingly disturbed with playing politics with our borders. Take necessary action to protect our land.

AR003021

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-3fv8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1350

Comment Submitted by Helen Harnett

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## Submitter Information

**Name:** Helen Harnett

**Address:**

927 N. Salcedo Street

New Orleans, 70119

**Email:** hharnett@gmail.com

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## General Comment

USCIS should not remove the 30 day processing provision for work permits for asylum seekers. Those seeking asylum need work permits in order to provide for their families in terms of basic needs such as food and housing. Delays can lead to food insecurity and homelessness.

AR003022

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-fblh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1351

Comment Submitted by Phyllis Dillard

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## Submitter Information

**Name:** Phyllis Dillard

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## General Comment

Please support the President in securing the border and doing all possible to secure our country from undesirables entering the USA. Build the dang wall.

AR003023

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-hfdd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1352

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I strongly oppose eliminating the 30-day processing provision for asylum applicant-related employment authorization applications. Removing the 30-day timeline would result in lower tax revenues for local, state, and federal government. It would negatively impact employers who could not hire individuals because of the delay in work authorization. It would negatively impact asylee families who require work authorization and a Social Security Number to access benefits to which they are entitled. USCIS processing times are at all-time highs for many case types, and often exceed posted processing times. Extended waits for employment authorization place strain and hardship on applicants and their families who are already vulnerable by virtue of having fled persecution.

AR003024

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-pfi9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1353

Comment Submitted by Robert Ruiz

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## Submitter Information

**Name:** ROBERT RUIZ

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## General Comment

It is unbelievable that in-place bureaucrats have artificially & unreasonably limited the time for someone to be properly vetted to entire our country. We need to know who is here!

AR003025



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-xi5u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1354

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

As a scientist and friend of journalists seeking asylum both in the United States and other countries, I understand how critical it is for stable, peaceful nations to accept those seeking asylum from less stable and more authoritative nations. Without providing a place where scientists whose research is muted or journalists who intend to expose the flaws of their native countries, the world loses critical minds who have the ability to change it.

This new proposal largely seems to be a poorly hidden attempt to discourage refugees from coming to a country where they can freely express themselves to create a positive change so they can return to a country they have improved. The message is clear: "Seek asylum at your own peril. You can come here, but you cannot work unless you do so illegally - breaking immigration requirements and forcing you out."

Without an ability to pay for their legal counsel, food, utilities, and the materials they need, those seeking asylum will be forced back into the countries where they are being persecuted. Without the safe haven of western states, the leaders seeking change in Colombia would not have been able to achieve it. The leaders seeking change in Egypt would not have been able to achieve it. The leaders seeking change in Pakistan would not have been able to achieve it.

AR003026

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-tjpy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1355

Comment Submitted by Sandra Long

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## Submitter Information

**Name:** Sandra Long

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## General Comment

Please stand with President Trump and make sure all people seeking refuge in our country are thoroughly vetted and then must seek citizenship in this country.

AR003027

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-tnyj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1356

Comment Submitted by Howard Myers

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## Submitter Information

**Name:** Howard Myers

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## General Comment

This proposed rule is outrageous. Not only does it violate the spirit of the recent court decision requiring the USCIS to abide by its own time limit, but it violates the commitments made by the US immigration laws around asylum that were enacted in Congress. This action would incentivize the government to wait an unreasonably long time to grant employment authorization, which I believe is probably its intent. A person who is an asylum applicant is permitted to remain in the United States until that application is decided. It is unreasonable for the US government to subject asylum applicants to the indignity and hardship of not allowing them to work.

AR003028

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-j0at
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1357

Comment Submitted by Fran Ellison

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## Submitter Information

**Name:** fran ellison

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## General Comment

for once, do something right. let President Trump lead t he way. He's doing a great job. Listen.

AR003029

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-iuju <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1358

Comment Submitted by Vince Prewitt

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## Submitter Information

**Name:** VINCE PREWITT

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## General Comment

please protect our country and our borders. Help President Trump do this...

AR003030

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-fmuy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1359

Comment Submitted by Curt Cuomo

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## Submitter Information

**Name:** Curt Cuomo

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## General Comment

It is time to support President Trumpet immigration reforms!

AR003031

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6g-31wa <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1360

Comment Submitted by Betty Hill

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## Submitter Information

**Name:** Betty Hill

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## General Comment

Support Trumps immigration policies  
We want to secure US borders

AR003032

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1361

Comment Submitted by Nancy McBride

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## Submitter Information

**Name:** Nancy McBride

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## General Comment

It is my opinion that all illegals should be sent back to where they came from until their case can be heard for asylum. If they don't feel safe in their country they can go back to Mexico or Canada. No child born or parented by an illegal should be allowed citizenship just because they were born here. Enough is enough, STOP the illegals from coming into the USA and deport the ones that are already here. They can come in legally or not at all.

Americans First.

God Bless & Help America from the evil that is growing here. In Jesus Christ's Name Amen

AR003033



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-9zz5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1362

Comment Submitted by Alan Brandt

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## Submitter Information

**Name:** Alan Brandt

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## General Comment

COMPLAINT:

America is less safe today because of arbitrary bureaucratic timelines.

SUPPORT:

President Trump improve U.S. national security by removing arbitrary bureaucratic timelines.

AR003034

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-fnwe
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1363

Comment Submitted by Joni Collins

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## Submitter Information

**Name:** Joni Collins

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## General Comment

We need to show our President that we will stand with him on his policy of taking time to be sure that those who are seeking to enter our country have a through background check before allowing them in.  
I hope that Oklahoma's senator will do this.

AR003035

# PUBLIC SUBMISSION

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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1364

Comment Submitted by Linda Brooks

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## Submitter Information

**Name:** Linda Brooks

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## General Comment

I want to support time to properly checking out those who seek out to be in this country before they ars allowed to do so.

AR003036

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1365

Comment Submitted by Ian Wagreich

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## Submitter Information

**Name:** Ian Wagreich

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## General Comment

The proposed rule to eliminate the 30 day deadline for initial asylum EAD applications is not only inhumane, and will harm asylum seekers and their families, but it will lead to huge losses in tax revenues from lawfully employed asylum applicants. I strongly urge the administration to reject this rule.

AR003037

# PUBLIC SUBMISSION

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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-ur1b
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1366

Comment Submitted by Deborah Anderson

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## Submitter Information

**Name:** Deborah Anderson

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## General Comment

Stop this insanity. American citizens have a right to safety. We consider all this law breaking to be a coup! We are completely fed up!!!

AR003038

# PUBLIC SUBMISSION

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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-tpq1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1367

Comment Submitted by William Rodgers

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## Submitter Information

**Name:** William Rodgers

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## General Comment

I am a strong supporter of President Trump's reforms. We need to do what it takes to prevent the system and our nation from being burdened with the rejects from other parts of the world. .  
Do what your have to to send undesirables back to their own homelands to be taken care of there not here

AR003039

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1368

Comment Submitted by Carol Blackburn

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## Submitter Information

**Name:** Carol Blackburn

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## General Comment

Please remove dates for Immigration reforms so President Trump can do the job right.  
Thank you. ,

Carol Blackburn

AR003040

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1369

Comment Submitted by John Orr

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## Submitter Information

**Name:** John Orr

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## General Comment

Will the DNC please start to use some common sense after decades of idiotic party line attempts to ruin this country!

AR003041



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-7966
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1370

Comment Submitted by Glen Koths

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## Submitter Information

**Name:** Glen Koths

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## General Comment

Start using your head.

AR003042

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1371

Comment Submitted by Mary Mangum

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## Submitter Information

**Name:** Mary Mangum

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## General Comment

Support President Trump's immigration reforms. It's important to our country.

AR003043

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1372

Comment Submitted by Marcia Behrens

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## Submitter Information

**Name:** Marcia Behrens

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## General Comment

My husband is a retired veteran, and I am a retired R.N. We are asking for your support for President Trump's immigration reforms. We believe that our entire immigration system is broken, and there are many loopholes. We believe that, because SO many people are trying to enter our country ILLEGALLY, we must have strong borders. We do NOT want criminals, drug and sex traffickers, and people who only want handouts from us, to come into this country ILLEGALLY! DHS and CBP (customs and border patrol) desperately need your support. They are overwhelmed! The WALL is necessary, because too many people are just crossing into our country ILLEGALLY!! IF WE DO NOT HAVE A SECURE BORDER, WE DO NOT HAVE A SAFE COUNTRY! This is BASIC to our country's welfare.

AR003044

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-ln85
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1373

Comment Submitted by Robert Blake

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## Submitter Information

**Name:** Robert Blake

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## General Comment

Please give President Trump's Administration their requested time to do proper and complete background checks on all non-citizens wanting to enter the USA.  
This is a must to protect us US Citizens.

AR003045

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-rt0w <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1374

Comment Submitted by Katerina Postlewait

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## Submitter Information

**Name:** Katerina Postlewait

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## General Comment

Please cut the restrictions on immigrations,  
President Trump can secure all Americans safety.

AR003046

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-gslp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1375

Comment Submitted by Trena Patterson

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## Submitter Information

**Name:** Trena Patterson

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## General Comment

You need to give the Trump Administration enough time to thoroughly check the background of every asylum seeker, quit forcing them to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline. No more!

AR003047

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-m2z4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1376

Comment Submitted by Jerry Payseno

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## Submitter Information

**Name:** Jerry Payseno

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## General Comment

Please use common sense and support President Trump's immigration reforms you took a oath to serve and protect the American people and you politicians are not doing your job and you need to remember that you politicians work for the American people not foreigners thank you and remember it's common sense.

AR003048

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1377

Comment Submitted by Andrea Guttin

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## Submitter Information

**Name:** Andrea Guttin

**Address:**

Houston, Texas, 77006

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## General Comment

I am an immigration attorney and have been practicing law since 2009. I have represented asylum seekers before USCIS and EOIR. I have firsthand knowledge of how critical it is that asylum seekers are able to get work authorizations while their applications are pending - and that those applications are adjudicated expeditiously. Asylum seekers cannot get US government-issued identification (such as a Texas state drivers license) without an EAD and social security number. Without these documents, asylum seekers have trouble accessing healthcare, transportation, education, and many more services. They cannot work, which means they cannot support themselves or their families during what is a critical time in their lives. Without income, it is difficult to hire an attorney. Numerous studies have shows how critical representation is to winning a case.

A lack of income hinders opportunities to find and retain competent legal counsel. Studies have shown that immigrants who are represented as much more likely to win relief than those who go without representation. A 2014 study by the Stanford Law School found that detained immigrants with representation are three times more likely to win their deportation case than those without attorneys (See Key Findings of Access to Justice for Immigrant Families and Communities: Study of Legal Representation of Detained Immigrants in Northern California. Available: <https://media.law.stanford.edu/organizations/clinics/immigrant-rights-clinic/11-4-14-Access-to-Justice-Report-FINAL.pdf>). For asylum-seeking women and children, the odds of winning an asylum case increase fourteen-fold with legal representation (See Syracuse Universitys TRAC report: <http://trac.syr.edu/immigration/reports/396/>). The most current research, released in November 2017, shows that in the first three years of the New York Immigration Family Unity Project (NYIFUP), which follows the universal representation model, 48% of cases ended successfully meaning clients won the right to stay legally in the United States. This is a 1,100% increase from the observed 4% success rate of unrepresented cases before NYIFUP (Vera, Evaluation of the New York Immigrant Family Unity Project, Nov. 2017. Available: <https://www.vera.org/publications/new-york-immigrant-family-unity-project-evaluation>). Put another way, for every 12 people who received counsel, 11 would have been deported without the attorney that was provided at

AR003049



no cost to them through the NYIFUP program.

I oppose the proposed rule. If implemented this rule will harm asylum seeking families by limiting their access to government-issued ID and income. The DHS should immediately withdraw its current proposal, and dedicate its efforts to advancing policies that strengthen rather than undermine the safety and security of those seeking asylum in our country.

AR003050

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1378

Comment Submitted by Kathleen Moccio

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## Submitter Information

**Name:** Kathleen Moccio

**Address:**

115 Valleyview Place  
Minneapolis, MN, 55419

**Email:** kmoccio@umn.edu

**Phone:** 6127995159

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## General Comment

Current law mandates that USCIS adjudicate applications for employment authorization within 30 days. The current mandate gives the government adequate time to complete processing while providing immigrants, particularly asylum seekers, with an opportunity to support themselves and integrate into their new home community. The proposed rule to eliminate the 30 day processing deadline is cruel and unnecessary. Please do not eliminate the 30 day processing. There is no need to do so and it unnecessarily harms the most vulnerable among us.

AR003051

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1379

Comment Submitted by DMin Shimanek

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## Submitter Information

**Name:** DMin Shimanek

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## General Comment

Come on Democrats & RINOs quit playing "Let's get Trump and Destroy The United States!" It's time you go to work and MAKE AMERICA SAFE & GREAT AGAIN !

AR003052

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1380

Comment Submitted by Sheila Stuhlman

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## Submitter Information

**Name:** Sheila Stuhlman

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## General Comment

I oppose the regulation because of harm caused to asylum seekers who need to work in order to support themselves while they wait for their cases to be adjudicated. Furthermore, the inability to work harms businesses who have a hard time finding workers and results in a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

AR003053

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1381

Comment Submitted by Theodore Cox

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## Submitter Information

**Name:** theodore cox

**Address:**

325 broadway, ste. 201

new york, NY, 10007

**Email:** theodorecox@gmail.com

**Phone:** 2129251208

**Fax:** 212-624-0232

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## General Comment

do not change asylum work rules. protecting asylum seekers is in our national interest.

AR003054

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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1382

Comment Submitted by Jeffrey Feinlboom

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## Submitter Information

**Name:** Jeffrey Feinlboom

**Address:**

43 Theodore Fremd Avenue

2nd Floor

RYE, 10580

**Email:** jeffrey@fbllp.com

**Phone:** 212-279-5299

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## General Comment

I have been practicing immigration and nationality law for over 23 years and have represented dozens of asylum applicants throughout my career. Protecting bona fide applicants for asylum is a bedrock principal of our immigration law. It is also foundational to the United States, whose founding fathers sought a better life in the New World and, ultimately, succeeded in divorcing themselves from political oppression and persecution at the hands of a foreign power.

The proposed regulation is ill-advised on humanitarian, economic and public safety grounds. Asylum applicants must already wait 150 days before applying for employment authorization. Eliminating the 30-day adjudication rule would needlessly delay essential benefits to this class of immigrants. By USCIS's own account, it would also result in the loss of substantial tax revenue. The proposed rule also raises public safety concerns. The public is served when they can be lawfully and gainfully employed, and the rule would create an environment where workers can be taken advantage of and even abused and wages - including wages for US citizens - are depressed.

I therefore OPPOSE the proposed rule.

AR003055

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1383

Comment Submitted by Cathy Webster-Clint

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## Submitter Information

**Name:** Cathy Webster-Clint

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## General Comment

Instead of giving the Trump Administration enough time to thoroughly check the background of every asylum seeker, theyre being forced to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline.

Please help President Trump and Ken Cuccinelli secure Americas safety by removing the arbitrary bureaucratic timeline.

AR003056

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-6rm8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1384

Comment Submitted by Lauren Kostas

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## Submitter Information

**Name:** Lauren Kostas

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## General Comment

Taking away any requirement for the government to adjudicate these quickly completely puts asylum seekers and their families at risk. they have no financial security as they cannot work. They are therefore dependent on family, friends, or the government for housing, food, etc. Asylum proceedings can take years, and it is bad for the US if we do not allow them to work during this time. The government will lose money from the taxes their wages would equal. Asylum seekers and their families would be at risk without healthcare or income, and vulnerable to be trafficked.

AR003057



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-rxr4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1385

Comment Submitted by Laguin Barnett

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## Submitter Information

**Name:** LAGUIN BARNETT

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## General Comment

This process is vitally important. The President shouldn't be rushed through it. People who are playing by the rules will be lost in the cross fire. This will overwhelm Immigration Services and people who shouldn't get in will. this is not fair.

AR003058

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-gxo3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1386

Comment Submitted by Robert Clark

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## Submitter Information

**Name:** Robert Clark

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## General Comment

Only the people who apply properly through regular channels should be allowed to stay in America. All other aliens should be deported, especially the ones coming over the southern US border. Eliminate amnesty as a route to staying in the US. We, the people, have had enough of this travesty! Support the President!!!

AR003059

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-n951 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1387

Comment Submitted by Mike Robinson

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## Submitter Information

**Name:** Mike Robinson

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## General Comment

Leave The President ALONE So He Can Perform The Job He Was ELECTED To DO

AR003060

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-p91r <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1388

Comment Submitted by Rachel Hernandez

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## Submitter Information

**Name:** Rachel Hernandez

**Address:**

1310 Stratton Ave  
Nashville, TN, 37206

**Email:** [rosehernandez@gmail.com](mailto:rosehernandez@gmail.com)

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## General Comment

This proposed rule will harm asylum seekers and their families, and USCIS even estimates it will lead to \$100s of millions of lost tax revenue. Asylum seekers need to work while waiting for their cases to be processed so they can support themselves.

AR003061

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-1tkm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1389

Comment Submitted by Jimmie Austin

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## Submitter Information

**Name:** Jimmie Austin

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## General Comment

I want PRESIDENT Trump's immigration reform plan. We definitely need to secure our borders and make sure those who come in legally are ok'd to agree to be honest citizens.

AR003062

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-ibfw <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1390

Comment Submitted by Irene Crook

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## Submitter Information

**Name:** Irene Crook

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## General Comment

Please support President Trumps immigration reforms. Thank you for your time and support.

AR003063

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-9r28
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1391

Comment Submitted by Sarah Owings

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## Submitter Information

**Name:** Sarah Owings

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## General Comment

The DHS should not change this rule. Asylum seekers already have to wait 6 months from the time they properly submit their applications for asylum to be eligible for work authorization, and only become eligible if their claim for asylum is not adjudicated within those six months. With current processing times for non-asylum-based EADs, it will be well over a year from the time a foreign national properly submits an application for asylum until they would be approved for work authorization. The 30-day window basically keeps them in line with other applicants for work authorization and asylum seekers should not be further penalized due to backlogs in adjudication of asylum claims. Additionally, in many states, valid work authorization is required for people to obtain state ID and driver's licenses - further delay goes against state interests as we want people to be properly documented for driving privileges.

AR003064

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6g-tpxh <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1392

Comment Submitted by Kenneth Fabregas

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## Submitter Information

**Name:** Kenneth Fabregas

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## General Comment

Support President Trump's immigration reforms.  
Do what you were elected to do .

AR003065



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-ddak
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1393

Comment Submitted by Corinne Mirer

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## Submitter Information

**Name:** Corinne Mirer

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## General Comment

Help President Trump keep American Citizens safe ....TAKE AWAY THE ARBITRARY BUREAUCRATIC TIMELINE. It is time to stop your selfish quest for power and RESPECT AMERICAN CITIZENS WHO PAY YOU!!!!!!!!!!!!!!!!!!!!!!

AR003066

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-2pm6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1394

Comment Submitted by Elwood Ward

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## Submitter Information

**Name:** Elwood Ward

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## General Comment

Lets get something done so we can save our imigration program and not destroy our country! I definitely support President Trumps program! Thank you!

AR003067

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-recq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1395

Comment Submitted by Larry Smith

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## Submitter Information

**Name:** Larry Smith

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## General Comment

Build the wall, and get it finished! I was in Jamacha this week and there is a place where there is no wall at all!

AR003068

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-7ak2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1396

Comment Submitted by Douglas Jackson

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## Submitter Information

**Name:** Douglas Jackson

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## General Comment

Back the president and secure our borders

AR003069

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6h-es8w <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1397

Comment Submitted by Leslye Lindholm

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## Submitter Information

**Name:** Leslye Lindholm

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## General Comment

By law, the Trump Administration is restricted to an inadequate 30 days to properly screen each and every single asylum seeker that comes to our country and applies for a work permit. In order to meet this unrealistic timeline, officials are forced to cut corners on background checks and divert resources away from assisting those immigrants that are playing by the rules. This makes our country less safe. Remove this arbitrary timeline that jeopardizes our national security.

AR003070

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-icgo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1398

Comment Submitted by Patricia Mattos

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## Submitter Information

**Name:** Patricia Mattos

**Address:**

3030 35th Ave S

Minneapolis, MN, 55406

**Email:** cats\_rule\_me@earthlink.net

**Phone:** 6127248483

**Fax:** 6517262518

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## General Comment

Asylum seekers leaving everything behind in their home country. They must still wait 150 days from the date they file for asylum to apply for asylum. This is hardship enough for people who have had to leave quickly and leave everything behind. This rule helps them to begin the process of getting back on their feet within 30 days of submitting their initial work application. It is cruel and unconscionable to make them wait longer by removing this regulation.

AR003071

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-72lj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1399

Comment Submitted by Jessica Woolever

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## Submitter Information

**Name:** Jessica Woolever

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## General Comment

I am an immigration attorney at a nonprofit organization. We represent many of the most vulnerable immigrants who come to this country, including asylum seekers. This proposed rule change is just another attempt by the administration to further deter people trying to escape persecution for coming to the United States. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

AR003072

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-aeqq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1400

Comment Submitted by Jan Haxton

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## Submitter Information

**Name:** Jan Haxton

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## General Comment

President Trump should have as long it takes to check people coming into country. He is charged with keeping America safe.

Jan Haxton

AR003073



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-nj1n
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1401

Comment Submitted by Barbara Cowherd

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## Submitter Information

**Name:** Barbara Cowherd

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## General Comment

We need to vet those coming into our country in a much better way. Whatever times it takes should be utilized. Too many drugs and too many violent people, and too many children and women being sold to sex traffic. Our immigration laws need to be changed!

AR003074

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-uxuw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1402

Comment Submitted by Daniel Hanlon

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## Submitter Information

**Name:** Daniel Hanlon

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## General Comment

Removing the 30-day mandate will place a decidedly vulnerable class of individuals in a position where they must make a decision between prosecuting their asylum claim, without the ability to work and support themselves, or return home where their lives are endangered. The proposal to strip the 30-day rule is plainly unfair and lacks any rational basis. It is a broad-stroke deterrent to asylum seekers without any calculus as to the merits of individual claims.

AR003075

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-jubl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1403

Comment Submitted by Vanessa Dell

---

## Submitter Information

**Name:** Vanessa Dell

**Address:**

201 E 36th St  
New York, NY, 10016

**Email:** vanessaldell@gmail.com

**Phone:** 9174840200

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## General Comment

This proposed rule makes absolutely no sense unless you prioritize a white supremacist agenda over the economic health of our nation. USCIS itself admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

AR003076

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-f2tw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1404

Comment Submitted by Jon Howland

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## Submitter Information

**Name:** Jon Howland

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## General Comment

Please take the time needed to vet any asylum applicants. We the People expect you to protect us from terrorists. You are the guardians at the gate . . .

AR003077

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6h-r97k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1405

Comment Submitted by Jessica Walters

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## Submitter Information

**Name:** Jessica Walters

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## General Comment

Please keep the 30 day processing provision in place. It helps all of us to have workers who have the legal documents they need and it keeps USCIS from letting applications for work permits sit in limbo for a long time. The asylum seekers who are applying for work permits want to contribute, and if we make it harder for them to work, we are only harming our economy as well as the individual person.

AR003078

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6f-uned
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1406

Comment Submitted by Sophie Clark

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## Submitter Information

**Name:** Sophie Clark

**Address:** United States,

**Email:** sclark3@law.stetson.edu

**Phone:** 4077822301

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## General Comment

See attached file

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## Attachments

Comment on DHS NPRM of 30-day Removal on Assylum

AR003079

**Comment on the Notice of Proposed Rule by DHS:  
Removal of 30- Day Processing Provision for Asylum Applicant**

Removing the thirty-day process goes against the international agreements and Congress's intent. It will result in a great unfairness to asylum seekers, counter to the UNHCR "fair and efficient" standard. First, removing the thirty-day requirement deters from the purpose of the 1967 Protocol (Protocol) promulgated by the UNHCR—which the United States committed itself to follow when it ratified the Protocol in 1968. The UNHCR recognizes the rights of asylees, and one of those rights is being able to *work*.<sup>1</sup> Currently, asylum seekers have to wait 150 days to apply for a work authorization from the date of filing their asylum applications before they get the thirty-day adjudication on their EAD form in order to get a job after fleeing their home country. Requiring USCIS to adjudicate the work authorization application within thirty-days of its filing gave the ability for the asylum seekers to work within 180 days while their asylum application was pending, hence providing them with a fair system—a time frame they could depend on. Now, DHS decided to create an *unfair* and *inefficient* procedure, opposite to UNHCR's '*fair* and *efficient*' asylum standard. Second, the DHS is disregarding the congressional intent from when the Refugee Act of 1980 was enacted. The legislative history states that Congress wanted to have an *effective* settlement for the refugees. Also, the text of the Refugee Act resembles the language of the Protocol, demonstrating Congress's intent to conform U.S. law with international regime.<sup>2</sup> Removing the thirty-day requirement is not going to make settlement for asylees effective nor respect the international approach on how to treat asylees.

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<sup>1</sup> Protocol Relating to the Status of Refugees art. 17, Jan. 31, 1967, 19 U.S.T. 267 (emphasis added).

<sup>2</sup> See *generally* *Negusie v. Holder*, 555 U.S. 511, 520 (2009).

DHS states they want to focus on eliminating the thirty-day so they can focus on other applications and slowly process the applicants for security reasons. However, Trumps administration's current attack on asylum immigrants leads one to believe this NPRM is more of an attempt to further get rid of asylum in the U.S. The Trump administration has used many other derogatory terms to disrespect the asylum process. Trump has deemed this process as a loophole, disregarding the inherent federal and international law governing asylum in the United States. Thus, the vague justifications seem to be an attempt to cover the United States' hostility toward asylees.

### **I. Going Against International Agreements**

The Refugee Act was created in 1980 when the issues of refugees seeking asylum were becoming a prevalent issue in the United States. The Refugee Act was created after Congress had ratified the United Nations' 1967 Protocol which represented the rights of refugees and asylees. The Protocol was voted in unanimously by the Senate. The United Nations procedures for refugees influenced the Act. For example, the legislative history points out that Congress adopted the Protocol's definition of refugee, which expanded the U.S. original definition of refugee.<sup>3</sup> Prior to the Act, the U.S. had an anticommunist ideology when allowing refugees fleeing from communist countries. Thus, the definition changed when Congress dropped the anticommunism criterion and expanded eligibility to any applicant who had a "well-founded fear of persecution." This adoption evidences the intent of Congress to adhere to international agreements. Even in the Senate Reports, the Conference clarified that the Refugee Act's asylum procedures shall be construed to be consistent with the Protocol.<sup>4</sup>

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<sup>3</sup> H.R. REP. NO. 96-781, at 19 (1980) (Conf. Rep.).

<sup>4</sup> S. REP. NO. 96-590, at 20 (1980) (Conf. Rep.).



The Protocol made an impact on the U.S. policy regarding refugees and asylees before Congress created the Refugee Act of 1980. First, President Johnson called the Protocol a “comprehensive Bill of Rights” for refugees. It was a subject of international concern and the U.S. needed to raise its standard to set an example for other countries.<sup>5</sup> Additionally, the State Department stated that ratifying the Protocol “extends the image of the United States as nation concerned with the persecuted.”<sup>6</sup> Lastly, after the ratification in 1968 and before the Act in 1980, fifteen federal courts had used the Protocol for its expansive definition of refugees. The Protocol was used so much in the courts rulings that it became case law.<sup>7</sup> Thus, it is clear the Protocol has created a strong grounding for U.S. policy on how to treat refugees.

However, DHS is ignoring the international agreement that is the basis of our country’s asylum law.<sup>8</sup> By removing the thirty-day decision deadline, DHS *lowers* the standard the U.S. sets for other countries and does *not* set an image of being concerned with the persecuted. For one, it is lowering the standard on the treatment of refugees by adding additional undue delays before an asylee can work. Furthermore, dragging out response times on whether asylees can work does not set an impression of “concern with the persecuted,” rather it sets an example of being “concerned with *accepting* the persecuted.”

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<sup>5</sup> International Protection of Human Rights: The Work of International Organizations and the Role of U.S. Foreign Policy: Hearing Before the Subcomm. on Int’l Org. & Movements, 93rd Cong. 741 (1973).

<sup>6</sup> Id. at 740.

<sup>7</sup> Rebecca Hamlin & Philip E. Wolgin, *Symbolic Politics and Policy Feedback: The United Nations Protocol Relating to the Status of Refugees and American Refugee Policy in the Cold War*, 46 INT’L MIGRATION REV. 586, 593 (2012).

<sup>8</sup> REGINA GERMAIN, AILA’S ASYLUM PRIMER 1 (4<sup>th</sup> ed. 2005) (discussing how U.S. asylum is “unique because it is derived directly from international law”).

Today, the current asylum procedures from the UNHCR still refer to the 1967 Protocol. The asylum procedures are meant to be fair and efficient.<sup>9</sup> Fair and efficient procedure includes getting asylees the ability to work and support themselves and their families as they wait for their application to be processed. For example, UNCHR recently focused on how Ukraine's procedures on getting asylees jobs needed to be changed because of both the delays and administrative issues in processing the applications. Ukraine's procedures will force the asylees into unauthorized employment, exposing them to abuse.<sup>10</sup> The procedures Ukraine was using were not efficient and needed reform. Thus, removing the thirty-day process will put the United States in the same situation as Ukraine. The asylees' applications to obtain work authorization will be delayed longer, forcing them to work illegally.<sup>11</sup> Normally, asylum seekers are not coming to the United States with any means. Instead, they are running away from persecution. They cannot afford to live in the United States unemployed. Thus, due to their 'credible fear', they cannot return to their home country and are stranded in the U.S. with the only option to seek unlawful employment if they cannot seek legal employment within a reasonable time. Consequently, working unlawfully would be used against them when it comes time for their asylum application to be processed.

Thus, this new rule will delineate from the international ways we intended to represent and respect. It is implausible to argue that removing the thirty-day requirement is a fair and

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<sup>9</sup> *Asylum Process: Fair and Efficient Procedures*, UNHCR 2 (May 21, 2001, 2d meeting) <https://www.unhcr.org/en-us/protection/globalconsult/3b389254a/asylum-processes-fair-efficient-asylum-procedures.html>.

<sup>10</sup> *Id.*

<sup>11</sup> Nicole Narea, *A New Trump Administration Proposal Could Put Asylum Seekers Out of a Job*, VOX (Sept. 11, 2009, 1:00 PM EDT), <https://www.vox.com/policy-and-politics/2019/9/11/20853362/trump-work-permit-asylum>.

efficient procedure for the asylees who are already facing immense hardship. It is *not fair* for applicants to have to wait an unpredictable amount of days, with no idea of when exactly they will be able to work. It is *not efficient* for the government to remove the thirty-day processing time because this will slow down the process of work authorization applications, decrease the amount of jobs filled, and further clog up immigration courts.

## II. Going Against Congressional Intent

The new rule does not just delineate from the international agreements, but also from our legislative history. Removal of the thirty-day adjudication requirement delineates from Congress's intent when it created asylum law in the United States. In the Senate Reports, the Refugee Act of 1980 states, "The objectives of this Act are to provide a permanent and systematic procedure for the admission of this country of refugee of special humanitarian concern to the United States, and to provide comprehensive and uniform provisions for the *effective resettlement* and *absorption* of those refugees who are admitted."<sup>12</sup> (emphasis added). An effective resettlement "make available sufficient resources for employment training and *placement* in order to achieve economic self-sufficiency among refugees as *quickly* as possible."<sup>13</sup> (emphasis added). Further, in the Refugee Act, Congress declared, "It is the historical policy of the United States to respond to the urgent needs of persons subject to persecution in their homelands...provide assistance and resettlement opportunities to refugees to the fullest extent possible."<sup>14</sup> The Select Commission on Immigration and Refugee Policy in

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<sup>12</sup> S. REP. NO. 96-590, at 12 (1980) (Conf. Rep.).

<sup>13</sup> *Id.* at 11.

<sup>14</sup> The Select Commission on Immigration and Refugee Policy, U.S. Immigration Policy and the National Interest 155 (Final Report 1981).

1981 stated that, “long, drawn-out processing for asylum claims is in the interest of neither the potential asylee nor the United States.”<sup>15</sup>

Thus, removing the thirty-day requirement and delaying the time an asylee seeker can be eligible for work authorization is not an effective resettlement policy because it does not place the asylees into jobs quickly. Even in the Proposed Rule, DHS mentions that the “costs” of this change would likely delay the ability of applicants to work.<sup>16</sup> Additionally, DHS also points out that it originally created the thirty-day requirement to “ensure that bona fide asylees are eligible to obtain employment authorization as quickly as possible.”<sup>17</sup> Also, DHS has mentioned before that it would “not be appropriate” for asylees to wait longer than 150 days on getting approval on work authorization as they wait on their claim to be adjudicated.<sup>18</sup> However, DHS is proposing to abandon from a deeply rooted concept since 1980: *efficient resettlement* for asylees while also disregarding its own prior reasoning.

In 2018, a federal district court reinforced that USCIS must comply with the thirty-day process. The court stated, “it is abundantly clear that the balance of equities has been struck in favor of expedient adjudication of initial EAD applications so that asylum seekers may obtain work authorization when waiting—often for years—to have their asylum applications resolved.”<sup>19</sup> Further, the court said that “delays are less tolerable when human welfare are at stake.”<sup>20</sup> However, DHS ignores the court’s assertion and the “balance of equities” by eliminating the duty itself. The court pointed out that the agency is aware that 150 days of

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<sup>15</sup> *Id.* at 171.

<sup>16</sup> Removal for 30-Day Processing for Asylum Applicant, 84 FED. REG. 47141, 47151 (proposed Sept. 9, 2019) (amending 8 C.F.R. pt. 208).

<sup>17</sup> *Id.* at 47153 n. 11.

<sup>18</sup> *Id.*

<sup>19</sup> *Rosario v. USCIS*, 365 F. Supp. 3d 1156, 1161 (W.D. Wash. July 26, 2018).

<sup>20</sup> *Id.* at 1162.

waiting for a job is an “extraordinary” amount of time. The “plain language and clear objectives” of the agency’s thirty-day requirement was intended for efficient adjudications.

To conclude, DHS is going against its own previous reasonable objectives, federal case law, legislative history and international agreements which have grounded what asylum law is today. DHS is not adequately considering the circumstances by eliminating the thirty-day requirement. It is arbitrary and capricious for DHS to unduly delay asylees from being able to work in the United States longer than 180 days.

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6g-ao3a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1407

Comment Submitted by Christine Hagopian

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## Submitter Information

**Name:** christine Hagopian

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## General Comment

please help President Trump secure America's safety by removing his arbitrary bureaucratic timeline.

AR003087

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1408

Comment Submitted by David Sebastian

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## Submitter Information

**Name:** David Sebastian

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## General Comment

Stop the insanity! Close the borders until congress grows a backbone and writes legislation to properly admit people into this country. Immigration without assimilation is INVASION.

AR003088

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6f-xugb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1409

Comment Submitted by Deborah Bradshaw

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## Submitter Information

**Name:** Deborah Bradshaw

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## General Comment

Dear Congressmen:

You are not found the USA any favors by trying to thwart the new immigration policies President Trump has put forth which are to protect us at home first, take in people LEGALLY and screen them properly.

AR003089



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1410

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

People seeking asylum are fleeing from threats and trouble at home and are not likely to have much with them to sustain themselves. Asking them to wait more than 30 days is grossly unreasonable and irresponsible. The CIS is now taking months and months to issue cards allowing people to work. There is no sense in asking people who flee here (often with nothing) to wait more than 30 days to be allowed to sustain themselves. It's mean and small minded to try to end this policy.

AR003090

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1411

Comment Submitted by Mario Lugo

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## Submitter Information

**Name:** mario lugo

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## General Comment

We need to support President Trump! America First! Let's not get into the same problem Europe is in. Make America Great again. Support the President.

AR003091

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1412

Comment Submitted by Scott Bowers

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## Submitter Information

**Name:** Scott Bowers

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## General Comment

Quit jerking around and get something done about this problem that we have on the border. It looks like you dont care probably because you dont live on the border but we do.

AR003092

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1413

Comment Submitted by Briana Carlson

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## Submitter Information

**Name:** Briana Carlson

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## General Comment

The government rarely meets the 30 day deadline as it stands, it makes no sense to get rid of it, which would only further delay the process because the government will have no incentive to process the applications in a timely manner. Regulations like this exist for a reason, to hold the government accountable. The government MUST be held accountable. Further, asylum seekers already have to wait until 150 days after they have applied for asylum before they are eligible to apply for a work permit. Further delay is simply inhumane under the circumstances. Asylum seekers are among the most vulnerable in the population. They need to be able to provide themselves with food and shelter while seeking protection from the US government. Otherwise it will cost local governments more. Allowing people to work as quickly as possible saves more money and resources for everyone.

AR003093

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1414

Comment Submitted by Steven Ellis

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## Submitter Information

**Name:** Steven Ellis

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## General Comment

Support President Trumps immigration reforms. Not only is it your duty as a Federal official, but its the right thing for the country.

AR003094

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1415

Comment Submitted by Larry Smith

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## Submitter Information

**Name:** Larry Smith

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## General Comment

The Dem Party should be shut down for this kind of thing! They aren't patriots by a mile. Trump and his people have the right to know what people are entering the US, what kind of history these people have!!

AR003095

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1416

Comment Submitted by Hoffard Normand

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## Submitter Information

**Name:** Hoffard Normand

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## General Comment

BACK OFF! Let the officials do their job. I say close the border to ALL illegal activity. No rules that do not stop all illegal from entering this American Nation.

AR003096

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1417

Comment Submitted by Denisha Jones

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## Submitter Information

**Name:** Denisha Jones

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## General Comment

Removing this 30-day provision will seriously harm the ability of asylum seekers to gain employment while they for their court date. We don't want asylum seekers getting public aid but if we remove this 30-day provision we are ensuring they cannot become legally authorized to work. The court made the right decision in 2018 and we should bot allow this rule to undo that ruling.

AR003097



# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1418

Comment Submitted by Douglas Husbands

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## Submitter Information

**Name:** Douglas Husbands

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## General Comment

President Trump's immigration reforms are reasonable and designed to protect law-abiding, taxpaying American citizens and you should do everything to support these reforms. Protect American citizens and prevent illegal aliens from coming through our borders! Support President Trump's immigration reforms!

AR003098

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1419

Comment Submitted by Mahnoor Hussain, National Domestic Workers Alliance

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## Submitter Information

**Name:** Mahnoor Hussain

**Address:**

1201 K St NW  
Washington, 20005

**Email:** mahnoor@domesticworkers.org

**Organization:** National Domestic Workers Alliance (NDWA)

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## General Comment

November 7, 2019

Submitted via regulations.gov

Samantha Deshommes

Chief, Regulatory Coordination Division

Office of Policy and Strategy, U.S. Citizenship and Immigration Services, U.S. Department of Homeland Security

20 Massachusetts Avenue NW, Mailstop #2140

Washington, DC 20529-2140

Re: DHS Docket No. USCIS-2018-0001, RIN: 1615-AC19, Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications

Dear Ms. Deshommes,

The National Domestic Workers Alliance writes to comment on the proposed removal of timely processing provision of asylum applicant related form I-765 employment authorization applications. The United States Citizenship and Immigration Services (USCIS) proposed rule seeks to eliminate the regulatory requirement that USCIS adjudicate first-time applications for employment authorization by asylum applicants within 30 days of their filing. The rule would cause an indefinite delay on Employment Authorization Documents (EAD) adjudication which would have devastating impacts on the ability of asylum seekers and their families to achieve financial independence and economic security. The proposed rule is part and parcel of this administrations

AR003099

attempt to dismantle the U.S. asylum system. We urge that this rule be withdrawn in its entirety and that the current provision of 30-day EAD adjudication time frame remains intact.

The National Domestic Workers Alliance (NDWA) is a leading voice for our nations over two million domestic workers, who work as nannies, house cleaners and caregivers taking care of children, elderly, and people with disabilities. NDWA reaches and engages over 250,000 domestic workers through our 60 affiliate organizations. The vast majority of domestic workers are women and largely immigrants. NDWA also leads Families Belong Together, a broad-based coalition that have come together in 2018 to end family separation and detention of migrant children and families who are seeking asylum.

NDWA is a workers rights organization committed to raising and strengthening wage and industry standards to ensure that domestic workers achieve economic security and protection, respect, and dignity in the workplace. All workers should have the ability to exercise their rights and achieve economic security. Under this rule asylum seekers will be delayed from entering into the labor market and hindered from achieving economic self-sufficiency in a timely manner while their applications are pending. The proposed rule would force asylum seekers to go without work for months, exposing them to economic insecurity and other vulnerabilities.

The Department of Homeland Security (DHS) has proposed no alternative timeline - although it considered proposing a 90-day timeframe to replace the 30-day timeframe for adjudicating EADs (see p. 47166-47167 of the Notice), which would already be three times the current timeframe, DHS proposes to instead remove a timeframe entirely, suggesting that the agency anticipates these applications being significantly delayed. Furthermore, DHS already has the ability to stop the clock on the 30-day processing timeframe if they need to request additional documentation from an applicant.

#### Harms to Asylum Seekers Caused by Delayed Processing

As of June 2019, migrants with active immigration cases have been waiting an average of almost two years for a decision, according to the Transactional Records Access Clearinghouse at Syracuse University. In addition to the delayed processing of asylum applications, the inability to work for at least six months after requesting asylum already leaves many asylum seekers at risk of extreme hardship and vulnerability. Increasing that wait period will have devastating consequences. Without work authorization, asylum seekers cannot purchase health insurance under the Affordable Care Act or obtain a social security number, and often cannot apply for a state-issued identification card or drivers license, which further limits access to transportation, banking, and private-support services. Lack of income also hinders opportunities to find and retain competent legal counsel. The proposed rule causes extreme hardship for asylum seekers and limits their ability to gain meaningful employment which thus results in forgone taxes.

#### Economic Cost of Delayed Processing

Local, state, and federal governments will lose income tax revenue from asylum-seekers who are delayed in entering the job market. DHS acknowledged that processing delays would cause lost wages ranging from \$255.88 million to \$774.76 million to workers and employment tax losses to the government ranging from \$39.15 million to \$118.54 million. Additionally, DHS estimates that the annual Medicare and social security revenue loss to the government to be between \$39.15 to \$118.54 million dollars.

Sincerely,

Mahnoor Hussain, National Domestic Workers Alliance, [mahnoor@domesticworkers.org](mailto:mahnoor@domesticworkers.org)

Refer attached PDF for full comment

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## Attachments

Removal of 30 Day Proecssing Provision\_NDWA Comment

AR003100

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November 7, 2019

*Submitted via regulations.gov*

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy, U.S. Citizenship and Immigration Services, U.S. Department of  
Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, DC 20529-2140

Re: DHS Docket No. USCIS-2018-0001, RIN: 1615-AC19, Removal of 30-Day Processing Provision for  
Asylum Applicant-Related Form I-765 Employment Authorization Applications

Dear Ms. Deshommes,

The National Domestic Workers Alliance writes to comment on the proposed removal of timely processing provision of asylum applicant related form I-765 employment authorization applications. The United States Citizenship and Immigration Services (USCIS) proposed rule seeks to eliminate the regulatory requirement that USCIS adjudicate first-time applications for employment authorization by asylum applicants within 30 days of their filing. The rule would cause an indefinite delay on Employment Authorization Documents (EAD) adjudication which would have devastating impacts on the ability of asylum seekers and their families to achieve financial independence and economic security. The proposed rule is part and parcel of this administration's attempt to dismantle the U.S. asylum system. We urge that this rule be withdrawn in its entirety and that the current provision of 30-day EAD adjudication time frame remains intact.

The National Domestic Workers Alliance (NDWA) is a leading voice for our nation's over two million domestic workers, who work as nannies, house cleaners and caregivers taking care of children, elderly, and people with disabilities in private homes. NDWA reaches and engages over 250,000 domestic workers on a regular basis through our 60 affiliate organizations in 36 cities and 17 states, local chapters in Atlanta, Durham, Seattle, and New York City, and digital platforms. The vast majority of domestic workers are women and largely immigrants. NDWA also leads Families Belong Together, a broad-based coalition that have come together in 2018 to end family separation and detention of migrant children and families who are seeking asylum.

NDWA is a workers' rights organization committed to raising and strengthening wage and industry standards to ensure that domestic workers achieve economic security and protection, respect, and dignity in the workplace. All workers should have the ability to exercise their rights and achieve economic security. Under this rule asylum seekers will be delayed from entering into the labor market and hindered from achieving economic self-sufficiency in a timely manner while their

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applications are pending. The proposed rule would force asylum seekers to go without work for months, exposing them to economic insecurity and other vulnerabilities.

The Department of Homeland Security (DHS) has proposed no alternative timeline - although it considered proposing a 90-day timeframe to replace the 30-day timeframe for adjudicating EADs (see p. 47166-47167 of the Notice), which would already be three times the current timeframe, DHS proposes to instead remove a timeframe entirely, suggesting that the agency anticipates these applications being significantly delayed. Furthermore, DHS already has the ability to stop the clock on the 30-day processing timeframe if they need to request additional documentation from an applicant.

### **Harms to Asylum Seekers Caused by Delayed Processing**

As of June 2019, migrants with active immigration cases have been waiting an average of almost two years for a decision, according to the Transactional Records Access Clearinghouse at Syracuse University.<sup>1</sup> In addition to the delayed processing of asylum applications, the inability to work for at least six months after requesting asylum already leaves many asylum seekers at risk of extreme hardship and vulnerability. Increasing that wait period will have devastating consequences. Without work authorization, asylum seekers cannot purchase health insurance under the Affordable Care Act or obtain a social security number, and often cannot apply for a state- issued identification card or driver's license, which further limits access to transportation, banking, and private-support services. Lack of income also hinders opportunities to find and retain competent legal counsel.

By hindering timely processing of work authorization, the proposed rule causes extreme hardship for asylum seekers and limits their ability to gain meaningful employment which thus results in forgone taxes.

### **Economic Cost of Delayed Processing**

Local, state, and federal governments will lose income tax revenue from asylum-seekers who are delayed in entering the job market. DHS acknowledged that processing delays would cause lost wages ranging from \$255.88 million to \$774.76 million to workers and employment tax losses to the government ranging from \$39.15 million to \$118.54 million.<sup>2</sup> Additionally, DHS estimates that the *annual* Medicare and social security revenue loss to the government to be between \$39.15 to \$118.54 million dollars.

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<sup>1</sup> TRAC "Immigration Court Processing Time by Outcome"

[https://trac.syr.edu/phptools/immigration/court\\_backlog/court\\_proctime\\_outcome.php](https://trac.syr.edu/phptools/immigration/court_backlog/court_proctime_outcome.php)

<sup>2</sup> <https://www.federalregister.gov/d/2019-19125/p-71>

**NATIONAL  
DOMESTIC  
WORKERS  
ALLIANCE**

45 Broadway, Suite 320  
New York, NY 10006  
[info@domesticworkers.org](mailto:info@domesticworkers.org)  
646. 360. 5806  
DOMESTICWORKERS.ORG

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**Forcing asylum seekers to wait even longer for work authorization would further risk the health, safety, and very lives of the refugees requesting protection in the United States.**

Sincerely,

Mahnoor Hussain  
National Domestic Workers Alliance  
[mahnoor@domesticworkers.org](mailto:mahnoor@domesticworkers.org)

AR003103

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-ut16
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1420

Comment Submitted by Erin McKee

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## Submitter Information

**Name:** Erin McKee

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## General Comment

I am an immigration attorney, and I have worked with many asylum seekers and asylees. I strongly oppose the proposed rule. Asylum seekers need to be able to work as soon as possible to support themselves and families, which they have a right to do. This rule is part of a systematic attempt to make the lives of asylum seekers as difficult as possible, and it results in lost tax revenue. Moreover, it is a racist rule that has no real purpose outside of cruelty.

AR003104

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-dj4f
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1421

Comment Submitted by Martha Ruch

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## Submitter Information

**Name:** Martha Ruch

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## General Comment

Removing the 30-day processing provision for asylum applicants petitioning for work authorization only harms America and immigrants alike. The right to work is a basic provision that benefits both asylum seekers and our country. Asylum seekers struggle to defend their legal cases and support themselves and their families, and must be able to work to earn money for their livelihood. While they are in the United States defending their asylum cases, they are lawfully present. Our country only benefits from having asylum applicants work lawfully, and to be able to exercise this right as soon as possible while they are defending their asylum cases.

AR003105



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6i-tc54 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1422

Comment Submitted by John Johnston

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## Submitter Information

**Name:** John Johnston

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## General Comment

This Mickey Mouse response of Democrats is UNACCEPTABLE-- DO YOUR JOB!!! Provide the country what it deserves!!!!

AR003106

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-sc6y
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1423

Comment Submitted by Ava Benach, DC Girls Baseball

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## Submitter Information

**Name:** Ava Benach

**Address:**

6323 31st Place NW

Washington, DC, 20015

**Email:** acbenach@gmail.com

**Phone:** 2024878596

**Organization:** DC Girls Baseball

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## General Comment

The rule should not be amended. Asylum seekers need access to work authorization to support themselves, help with housing and to care for families. They have already waited for 150 days before applying and imposing another delay on them would cause an already vulnerable population to endure hardship. This will not deter fraud nor enhance security but will only work to create hardship.

AR003107

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6i-s531 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1424

Comment Submitted by Lynda Mealer

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## Submitter Information

**Name:** Lynda Mealer

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## General Comment

A country without strong borders is no country at all.

AR003108

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-wodw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1425

Comment Submitted by Misha Seay

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## Submitter Information

**Name:** Misha Seay

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## General Comment

I am a concerned citizen and immigration attorney who has represented dozens of individuals seeking asylum in the United States. The proposed rule eliminating the 30-day timeline for adjudicating an asylum seeker's work authorization is cruel and unwarranted.

Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

In the notice, USCIS makes frequent reference to a rise in national security threats as a reason to spend more time and resources on each decision. However, USCIS has reported that it has been able to decide over 99% of EADs within the 30-day timeframe for over the past year. Therefore, USCIS has proven its ability to adequately vet the amount of requests in a timely fashion. Moreover, its argument regarding increased threats serves only to prompt the need for a speedier process to properly protect national security, rather than its request to delay the process further. This need for a speedier process is further compounded by the fact that the EAD applicants are asylum-seekers already residing in the United States. If vetting must be done to prevent security risks, then having unvetted people in the U.S. subjected to a potentially indefinite review period seems contrary to the departments stated interests.

AR003109

This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-pm5t
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1426

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

First, the proposed rule will result in significant loss of tax revenue. USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security. Second, asylum seekers, individuals fleeing persecution, and who are required by law to apply for asylum within their first year of entry into the United States, will be unable to raise the funds necessary to secure housing and food, let alone the legal representation necessary to file for asylum in a timely manner. This rule will make it near impossible for individuals to secure legal representation necessary to meet an already arbitrary one year filing deadline. This is a xenophobic, insidious proposal that should not be approved.

AR003111

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6i-4iyh <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1427

Comment Submitted by Robert Haime

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## Submitter Information

**Name:** Robert Haime

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## General Comment

im outraged that trumps immigrations reforms are not being supported

AR003112

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-mxbs
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1428

Comment Submitted by Rick McKee

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## Submitter Information

**Name:** Rick McKee

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## General Comment

I have to put up with illegals every day here in Texas. They act like they are untouchable because the Kaufman county sheriff does not care about anything but being re-elected and leaves them alone to operate their dope houses as long as he gets his cut. Their will be a civil war in this county because Washington will not do the right thing and close the borders.

AR003113



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-7hey
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1429

Comment Submitted by Ronald McClain

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## Submitter Information

**Name:** Ronald mcclain

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## General Comment

There is no timeline on security , do whats right for the US. Two illegals escaped prison in N Calif. made it to Mexico and felt it easy enough to come back. It wasnt they were apprehended. Start using your head and stop thinking about votes, do whats right.

AR003114

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-rw6k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1430

Comment Submitted by Kelly Wells

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## Submitter Information

**Name:** Kelly Wells

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## General Comment

I wholly oppose the removal of the 30-day deadline. Removing the deadline is basically excusing government inefficiency and further targeting the most vulnerable people among us. Failing to timely issue work permits basically winks at employers who want to exploit desperate people, many of whom escaped their countries with nothing, and are now just trying to survive. If this government had any shame, which it doesn't, it would be embarrassed to have even proposed removing the deadline.

AR003115

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-u9yx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1431

Comment Submitted by Rina Gandhi

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## Submitter Information

**Name:** Rina Gandhi

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## General Comment

The proposed rule will not only negatively impact vulnerable populations, as USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. But also, this will impact the country as a whole due to the loss of millions in tax revenue. It is a concerted effort to punish immigrants from seeking relief available to them under our laws, to create greater instability for immigrant families, and to cause more chaos. If USCIS feels they are unable to process applications within the 30 day required timeline, then a more reasonable solution is to allow for applicants to apply sooner than 150 days. This way, USCIS receives more time to adjudicate I-765 petitions without further harming asylum applicants.

AR003116

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-4aw8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1432

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I firmly oppose this proposed rule. Preventing asylum seekers from obtaining work authorization in a timely fashion harms asylum seekers, their families, and American taxpayers.

Denying prompt work authorization to asylum seekers makes it more likely that they and their family members will be unable to support themselves and will be forced to go on public benefits at taxpayer expense. Without the ability to support themselves, asylum seekers are more susceptible to food and housing insecurity and homelessness. Additionally, work authorization---and the Social Security Number that comes with it---are often required in order to obtain a state ID. Without valid ID, asylum seekers are unable to purchase health insurance on most state ACA health exchanges. They may also be denied access to community service programs, many of which require some form of valid ID, proof of residency, or proof of income. Thus, not only will this rule harm already-vulnerable populations, it will do so at the expense of the American people, who will be forced to foot the bill to support people who are perfectly able and willing to work to support themselves.

Further, delayed work authorization means that asylum seekers are not paying taxes on the income they earn. Per USCIS, lost compensation to asylum applicants already ranges from \$255.88 million to \$774.76 million in taxable income per year. And USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change---projecting a loss of \$39.15 million to \$118.54 million per year---because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and Social Security. At a time when America's population is steadily aging, decreased contributions to these vital programs will only hurt the American people while providing no benefit at all.

The American people can only benefit from the ability of asylum seekers to quickly get work authorization so they can support themselves as their cases wind through the immigration system. I strongly oppose this proposed rule and support the 30-day window for adjudication of applications for work authorization.

AR003117

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6i-nhc <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1433

Comment Submitted by Robert Schaefer

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## Submitter Information

**Name:** Robert Schaefer

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## General Comment

Wake up and represent Americans. NOT YOURSELF

AR003118

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-3dmc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1434

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I work as an immigration and asylum attorney.

The elimination of the 30 day processing requirement for EADs, Form I-766, for asylum applicants would create a morally hazardous situation. Aliens who apply for asylum would be in lawful status but be forbidden from working to support themselves. This would create an incentive to work without authorization even if such aliens would be violating the law.

If the government is going to permit aliens to apply for asylum, then it should create the conditions necessary for such aliens to support themselves legally.

AR003119

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6i-2bhr <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1435

Comment Submitted by Russell Dark

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## Submitter Information

**Name:** Russell Dark

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## General Comment

PLEASE, PLEASE, PLEASE help Trump secure our borders .... the VERY THING THAT CONGRESS PASSED YEARS AGO before he got into office. PLEASE, before another 9/11 happens again!!

STOP THE BUREAUCRACY!!!!!! FOR ONCE, WORK TOGETHER TO HELP OUR COUNTRY STAY SAFE!!!

AR003120

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-83d8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1436

Comment Submitted by Paula Nogrady

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## Submitter Information

**Name:** Paula Nogrady

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## General Comment

Please protect our country. Reform the immigration laws. Thank you

AR003121



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-4181
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1437

Comment Submitted by Bruce Gabriel

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## Submitter Information

**Name:** Bruce Gabriel

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## General Comment

Instead of giving the Trump Administration enough time to thoroughly check the background of every asylum seeker, they are being forced to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline.

The un-American and radical left dont care that these radical restrictions jeopardize our national security or that they punish LEGAL immigrants for obeying our laws. They just want to keep them in place, all so they can keep our immigration system broken and undermine Donald Trumps presidency.

Thats why Im asking you to help President Trump secure Americas safety by removing this arbitrary bureaucratic timeline. Please provide more time to thoroughly check the background of every asylum seeker,

AR003122

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-x73h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1438

Comment Submitted by Kim Patton

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## Submitter Information

**Name:** Kim Patton

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## General Comment

The US must take all the time it needs to vet every single person seeking asylum and trying to enter the US. No deadlines should apply! Period!

AR003123

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6i-z7am <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1439

Comment Submitted by Kenneth Kobes

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## Submitter Information

**Name:** Kenneth Kobes

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## General Comment

Quit trying to undermine my families safety. Support President Trump and stop taking bribes from the traitors that are being my country down. Background check these invaders.

AR003124

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-qi32
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1440

Comment Submitted by Jesse Doran

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## Submitter Information

**Name:** Jesse Doran

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## General Comment

You must support President Trumps Immigration reforms. Allow background checks or vetting to take as long as it takes without imposing time limits.

AR003125

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6i-8u1v <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1441

Comment Submitted by Ashley Lively

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## Submitter Information

**Name:** Ashley Lively

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## General Comment

I believe that people seeking asylum should have the rights to work while their case is pending and the government should adjudicate their petitions within 30 days. Failure to do so is cruel and prevents those seeking asylum to pay taxes and contribute to society.

AR003126

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
<b>Tracking No.</b> 1k3-9d6i-1ido
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1442

Comment Submitted by Eric Adams

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## Submitter Information

**Name:** Eric Adams

**Address:**

1102 Briarcliff Place

Apt. B

Atlanta, GA, 30306

**Email:** eric@alemanylaw.net

**Phone:** 7068973616

**Fax:** 6786687490

---

## General Comment

I'm an attorney in Atlanta, Georgia, and I'm writing in opposition to the government's proposed changes to the EAD process for asylum seekers.

This proposed change would cause asylum seekers to lose wages, straining their ability to support themselves and their families, creating more desperate communities in our country, at no benefit to Americans. USCIS even acknowledged that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. This proposed change would screw a lot of things up.

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCIS's goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and

AR003127

properly vet each individual while reducing the risk of harm to each applicant.

# PUBLIC SUBMISSION

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---

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1443

Comment Submitted by Dorothy Martin

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## Submitter Information

**Name:** Dorothy Martin

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## General Comment

We need to be safe in this country in order to be in a position to help others. Do not tie the President's hands by limited the time to thoroughly investigate those who wish to enter -- just as my great grand parents were investigated!!!

AR003129



# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1444

Comment Submitted by Kelly Cveykus

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## Submitter Information

**Name:** Kelly Cveykus

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## General Comment

I am an immigration attorney who has worked with many asylum seekers. Asylum seekers come to this country desperate for protection, but willing to work hard to earn it. Taking away their ability to work makes them vulnerable to exploitation, puts them at risk for homelessness, and makes it impossible to support themselves and their families. Asylum seekers frequently come with their very young children out of the most desperate of circumstances. Those children deserve to live in a safe environment with access to basic resources, such as food. Changing the 30 day requirement would hurt not only the asylum seekers, but the American people. Once asylum seekers are allowed to lawfully work they contribute substantially to the U.S. economy. If the US government wants more time to process application for security concerns, then the government should allow them to apply sooner than the 150 day mark, so as not to extend the wait period.

AR003130

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1445

Comment Submitted by Irma Capetillo

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## Submitter Information

**Name:** Irma Capetillo

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## General Comment

Any one who puts non US citizens before US citizens should be considered as a trader to our country. This right now there are a lot of people who should be tried for treason. Breaking our laws is no laughing matter.

AR003131

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1446

Comment Submitted by Karen Burke

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## Submitter Information

**Name:** Karen Burke

**Address:**

1011 Connecticut Ave. NW, Ste. 450

Washington, DC,

**Email:** karen@burkeimmigration.com

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## General Comment

I am an immigration lawyer and have regular contact with asylum seekers, although I don't personally do the work because I find I cannot bear the emotional toll. Asylum seekers are among the most vulnerable among us and work authorization is a basic human necessity for survival and pursuit of the legal means to remain in the US. Even if they are ultimately denied asylum, with work authorization, they can take care of themselves, lessening the burden on the US, and contribute to the economy while their asylum applications wend their way through the system. These people need immediate authorization to work!

AR003132

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1447

Comment Submitted by Jeffry Devries

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## Submitter Information

**Name:** Jeffry Devries

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## General Comment

TOO MANY INNOCENT PEOPLE HAVE BEEN HURT ALREADY! DON'T EXPECT SYMPATHY FROM IMMIGRATION LAW ADVOCATES WHEN ONE OF YOUR OWN ARE KILLED OR RAPED!!

AR003133

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1448

Comment Submitted by David Ollanketo

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## Submitter Information

**Name:** David Ollanketo

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## General Comment

It only makes sense that legislators support President Trumps administration to adequately check the background of asylum seekers to ensure the safety of American citizens. No restrictive timeline is more important than protecting law-abiding immigrants as well as Americans.

AR003134

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1449

Comment Submitted by Clinton Kemp

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## Submitter Information

**Name:** Clinton Kemp

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## General Comment

What the heck is going on in Washington that we can't get congress to do their job and secure our southern border. Are they so against POTUS they would rather have the border unsecure?

AR003135

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1450

Comment Submitted by Laura Jacobson

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## Submitter Information

**Name:** Laura Jacobson

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## General Comment

This proposed rule is exceedingly harmful and unnecessary. Asylum seekers are already required by law to wait 150 days before they can apply for employment authorization. Removing the 30-day provision for processing those employment authorization applications would result in asylum seekers being forced to wait up to a year or longer from the time they've filed their application before they have authorization to work to support themselves. This will push asylum seekers into an underground labor market, making them susceptible to being paid unfair wages and disrupting the lawful labor market by undercutting wages for those who are authorized to work. It will also lead to an increased use of public benefits as many asylum seekers have U.S. citizen children to support. Finally, it simply penalizes the act of seeking asylum at all and is a cynical approach to a non-problem.

AR003136

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1451

Comment Submitted by Beth Dill

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## Submitter Information

**Name:** Beth Dill

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## General Comment

Please help President Trump secure the border, especially since these cartel gangs are getting worse, and we need to stop the drugs from coming over the border, and stop the child trafficking!

AR003137



# PUBLIC SUBMISSION

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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1452

Comment Submitted by Suchi Mathur

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## Submitter Information

**Name:** Suchi Mathur

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## General Comment

The 30 day deadline for asylum EAD adjudication is critical to the economy of this country and the financial, physical, and emotional well-being of all asylum applicants, their families, and the communities they live in. It would be truly nonsensical to delay adjudications of work permits for individuals with pending asylum applications. Allowing people to work allows them to be independent, instead of relying on public assistance, and enables families to support themselves and be healthy, instead increasing costs to institutions such as emergency rooms. When people who have a path to relief can work, they can become contributing members of their communities. There is also an independent mental health and emotional benefit, in which people feel a sense of belonging and participation in their communities when they have identification and the ability to work. Getting rid of this rule will undoubtedly increase costs of counties, cities, states, and the federal government, and result in negative outcomes to the applicants themselves financially and economically.

AR003138

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1453

Comment Submitted by David Camp

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## Submitter Information

**Name:** David Camp

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## General Comment

My parents both came from Europe, 2nd and 1st generations and both went thru the process of becoming American citizens. Freedom is hard and weve all been in the military.

AR003139

# PUBLIC SUBMISSION

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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1454

Comment Submitted by Paul Vaupel

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## Submitter Information

**Name:** Paul Vaupel

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## General Comment

Hello,

Please stand up for Trumps immigration reforms. Immigration should benefit the citizen first.

AR003140

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 07, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1455

Comment Submitted by David Macko

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## Submitter Information

**Name:** David Macko

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## General Comment

Rubio  
Rick Scot

AR003141

# PUBLIC SUBMISSION

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<b>Posted:</b> November 07, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1456

Comment Submitted by Laura Kelsey Rhodes

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## Submitter Information

**Name:** Laura Kelsey Rhodes

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## General Comment

The possibility of taking away asylum seekers' right to obtain work authorization is horrifying. Asylum applicants have usually endured unspeakable hardships in their countries: sexual assault, violent persecution, ostracism from their community. To require that they live in abject poverty here in the U.S. when they are willing and able to work is an abomination. It is a stain on our flag.

My father worked for the U.S. Department of State his whole career. I grew up proud to be American and honored that so many people we met in Sudan, Brazil and Paraguay saw the U.S. as a beacon of democracy and human rights. The ability to apply for asylum is one of those human rights. If you can't work while you are waiting for your interview or your hearing, you can't survive. Feeding your family is a human right, too.

Sincerely, L.K. Rhodes

AR003142

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6i-p4we <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1457

Comment Submitted by James Bentley

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## Submitter Information

**Name:** James Bentley

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## General Comment

The security and welfare of our great nation is worthy of all the time and efforts it takes to protect our society and way of life.

AR003143

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 07, 2019 <b>Tracking No.</b> 1k3-9d6i-7tbp <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1458

Comment Submitted by Amy Myers

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## Submitter Information

**Name:** Amy Myers

**Address:**

2907 Central Ave

Suite 109

Birmingham, 35243

**Email:** akm@tmimm.com

**Phone:** 2058718084

**Fax:** 205-871-8014

---

## General Comment

Please do not remove the 30 day processing provision for Asylum Applicants. Such a measure makes no sense and would be simply punitive. How do you expect these individuals to support themselves. What kind of country are we becoming? We have a low employment rate and we have jobs for these people to do. Please allow them to do them. We need to treat people with dignity and allow them to support themselves.

AR003144

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1459

Comment Submitted by Rachel Strong

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## Submitter Information

**Name:** Rachel Strong

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## General Comment

I do not support lifting the 30-day requirement for processing work authorization cards. In fact, I think lifting the requirement does the exact opposite of what the government intends. If the government wants to avoid paying in any way for undocumented people who are awaiting asylum decisions, then the government should let these people work as quickly as they are eligible. Otherwise, they may become dependent on the government or may become dependent on friends and family who in turn will become dependent on the government. It is better for the asylum seekers and for the government if these folks become independent, self sufficient earners. Also, you are penalizing people who are applying for humanitarian relief, who have been or fear they will be persecuted in their home countries. These are the most vulnerable people who we should be trying to protect, not harm further.

AR003145



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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1460

Comment Submitted by Aliya Karmali

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## Submitter Information

**Name:** Aliya Karmali

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## General Comment

As an immigration attorney, I find this proposed rule to be additionally burdensome on asylum seekers who already have to wait 6 months before they're eligible for work authorization, and are experiencing longer wait times and arbitrary denials by USCIS. Changing the current system would only make these refugees more vulnerable economically rather than help them contribute to the U.S. workforce while supporting their families.

AR003146

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1461

Comment Submitted by Bobbie Padgett

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## Submitter Information

**Name:** Bobbie padgett

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## General Comment

Please change the 30 days that is in effect now to more time to check immigrants out.

AR003147

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1462

Comment Submitted by Theresa Hall

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## Submitter Information

**Name:** Theresa Hall

---

## General Comment

The safety of every American is at stake with regards to the 30 day timeline which was put in place for our country to ensure every immigrant is vetted properly. I am requesting this timeline be at the discretion of ICE and the President and to stop stripping Americans of their rights to live safe, and not to place more financial burden because of immigration laws. I support our President and his choices because HE IS PUTTING AMERICANS FIRST.

AR003148

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1463

Comment Submitted by Carline Grossi

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## Submitter Information

**Name:** Carline Grossi

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## General Comment

The American people will never be safe until the border is secured and immigration has been reformed.

AR003149

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-xioj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1464

Comment Submitted by David Moss

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## Submitter Information

**Name:** David Moss

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## General Comment

Please support President Trump's effort to make America safe again with regards to immigration!

AR003150

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-tyno
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1465

Comment Submitted by Allen Casto

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## Submitter Information

**Name:** Allen Casto

---

## General Comment

For the sake of Americans across this great land you need to support your President.

AR003151

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<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1466

Comment Submitted by Beckie Moriello

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## Submitter Information

**Name:** Beckie Moriello

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## General Comment

Of course people should be allowed to work ASAP. I thought Republicans were into the free market. Are you saying they should sit around playing video games while waiting for their court dates?

AR003152

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1467

Comment Submitted by Kenneth Lukasiewicz

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## Submitter Information

**Name:** Kenneth Lukasiewicz

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## General Comment

I support my President

AR003153



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<b>Tracking No.</b> 1k3-9d6o-10ga
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1468

Comment Submitted by Ramona Scott

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## Submitter Information

**Name:** Ramona Scott

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## General Comment

Put Americans first where they belong. Not behind these illegal aliens who are sucking us dry all while theyre murdering raping torturing us and doing the same to our children! We should never have to pay for these criminals to have anything free in our country! On top of weak ass judges letting them all go free.

AR003154

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-wtz6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1469

Comment Submitted by Chuck Polzin

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## Submitter Information

**Name:** Chuck Polzin

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## General Comment

I'm tired of the BS going in in congress. President Trump has made many important change, badly needed changes since being fairly elected. However it looks as though the far left are doing everything they can to hold up progress. Not to forget the constant bashing our president takes daily by the radical left. We want the left to join in and help do the business for which they were elected. Your constant resistance will insure Trump's re-election in 2020. The nonsense private hearings must also stop. Many of the left will be replace in 2020 also, we promise.

AR003155

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-e7jz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1470

Comment Submitted by Bill Hayes

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## Submitter Information

**Name:** Bill Hayes

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## General Comment

they need to get off their dead tales and do what we pay them for I want send a message that said we pay Congress of Fortune to do nothing and we pay Trump nothing to do everything for the American people that is so true it needs to be reversed we need to pay them nothing and we should pay Trump all their salaries that would be what's right

AR003156

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-h4gl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1471

Comment Submitted by Judith Sommer

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## Submitter Information

**Name:** Judith Sommer

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## General Comment

The screenings need to be done thoroughly. If there is not sufficient time allowed for screening efficiently, then let's not do screening at all and reject all cases, send everyone back.

AR003157

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-sbvg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1472

Comment Submitted by Alexandra Blodget

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## Submitter Information

**Name:** Alexandra Blodget

**Address:**

PO Box 86071

Portland, OR, 97286

**Email:** ablodget@outlook.com

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## General Comment

I work with asylum seekers at a nonprofit immigration legal services program. The best way to make sure that asylum seekers are self-sufficient is to allow them to work. The reality is that even without work permits, they will work, because everyone needs to earn a living. This puts this group at risk of sub-minimum wage pay and exploitation by employers, which is harmful to the economy in general. Asylum seekers by definition are following the laws of the United States. There is no reason to prevent them from supporting themselves while going through this process.

AR003158

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-osqy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1473

Comment Submitted by Sylvia Griffith

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## Submitter Information

**Name:** Sylvia Griffith

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## General Comment

Please put the safety and security of USA citizens ahead of political correctness! Please continue to require and enforce requirements for thorough background and other checks for immigrants.

AR003159

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-999s
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1474

Comment Submitted by David Wright

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## Submitter Information

**Name:** David Wright

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## General Comment

USCIS must be required to produce employment authorization documents within 30 days. Even with this regulation in place, they often take 4 months or more to comply. The 30-day rule was instituted as part of the compromise that delayed EADs until 150 days' delay in adjudication - and only delays caused by the government count.

Letting asylum applicants work helps to get beyond the traumatic experiences many of them have suffered, it helps them integrate, and it keeps them and their families off public benefits.

AR003160

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-hbam
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1475

Comment Submitted by Lloyd Weiss

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## Submitter Information

**Name:** Lloyd Weiss

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## General Comment

We're paying you, to protect the American people.

AR003161



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-drwr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1476

Comment Submitted by Jason Dzubow

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## Submitter Information

**Name:** Jason Dzubow

**Address:**

1900 L Street, NW

Suite 305

Washington, 20036

**Email:** JDzubow@DzubowLaw.com

**Phone:** 2023281353

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## General Comment

I represent asylum seekers. Many of my clients are interpreters who served shoulder to shoulder with US troops in Afghanistan and Iraq. Others are human rights workers, women's rights workers, journalists, democracy activists, and members of ethnic and religious minorities. Many of my clients have worked to help the United States and further our country's interests. Now, these people need our help. If we turn our back on them, how can we expect others to work with us in the future. The asylum process is already difficult and slow. A work permit is crucial to surviving in the United States. Making it more difficult for asylum seekers to survive while their cases are pending will harm them, and it will harm our country by compromising our commitment to help those who have helped us. Making the work permit process slower will help no one. I hope you will reconsider this decision. Thank you

AR003162

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-e1gl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1477

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Feelings of Fear, Employer Exploitation, and Encouragement to Work Unauthorized

The proposed elimination of this regulation would be detrimental to asylum seekers' overall well-being and would encourage both employer exploitation and asylum seekers to work unauthorized in the U.S.

Giving priority to adjudicating work permits is in the best interest of the U.S. With a work permit, asylum seekers can work legally in the U.S. and not under the radar of the U.S. government. Because this proposed regulation would cause a never-ending backlog, asylum seekers would have no other choice than to work unauthorized. They would be forced to do this or starve to death. This regulation discourages lawful employment and encourages work in hiding. The U.S. would benefit from having authorized workers because lawful employment re-enforces the esteem of the rule of law in the U.S.

This proposal would also give employers free range to exploit unauthorized workers. With no ability to report wrongdoing, asylum seekers - who have already endured a lifetime of persecution - would be merciless at the hands of their employers. Employers would freely violate employment laws with no repercussions because asylum seekers would be scared to report since they would be working unauthorized.

Lastly, feelings of fear and desperation would overtake asylum seekers. A valid form of identification in the U.S. brings inexplicable relief. Not only can they work legally, but they feel a sense of security having a work permit. Being under the radar, on the other hand, causes feelings of fear and desperation - feelings they've had to battle their whole lives in their home country.

Re-enforce the rule of law and show these asylum seekers the U.S. really is a better place by not eliminating this 30 day deadline.

AR003163

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<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-pz1s <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1478

Comment Submitted by David Seitz

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## Submitter Information

**Name:** David Seitz

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## General Comment

I implore you to support President Trump's immigration reforms! Keep us safe!

AR003164

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-59qh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1479

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Do not remove the 30-day processing requirement for asylum related EADs. There is already a 5 month wait for an I-589 applicant to even file the application. Removing the 30-day requirement will likely extend the process another 6 months at the least. This will create significant hardship to many people who are simply trying to support themselves. These individuals are not eligible for benefits prior to a grant of asylum and therefore, considering the humanitarian interests at stake, including the ability to survive while the case is being litigated, the 30-day provision should remain in effect.

AR003165

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<b>Tracking No.</b> 1k3-9d6n-eh9u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1480

Comment Submitted by Mary de Rosas

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## Submitter Information

**Name:** Mary de Rosas

**Address:**

4730 S Pearl St  
Seattle, WA, 98118

**Email:** mderosas729@gmail.com

**Phone:** 2066838951

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## General Comment

I absolutely oppose this rule change. It is yet another way that the current administration is restricting the human rights of asylum seekers. Asylum seekers have already gone through amazingly harrowing and difficult circumstances to arrive in the US. They want to be self-supporting and they want to be contributing members of their communities. They want mostly to be self-sufficient and to be able to support their families. This rule change would severely undermine their abilities to support themselves. It would also encourage illegal work situations that put them at risk for exploitation and endanger their co-workers and community members. It is in the best interest of the US-economically and morally-to allow asylum seekers to gain work authorization as quickly as possible, and to remove any barriers from them doing so.

I have worked in immigration law for 20 years and every asylum seeker I've worked with has been desperate to begin working. It is their highest priority. There is no fiscal reason to change this law-it is mean-spirited and doesn't reflect well on us as a country.

AR003166

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<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6p-c3zh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1481

Comment Submitted by Patrick Sherwood

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## Submitter Information

**Name:** Patrick Sherwood

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## General Comment

Asylum applicants need to be able to work legally in the U.S. while they are waiting for their case to be processed. As USCIS is increasing the amount of time it takes cases to be processed, it would be particularly inappropriate to extend the amount of time for a work permit. It is important to remember that asylum law was instituted after World War II to try to prevent another atrocity. The U.S. has an obligation to continue to treat asylum seekers in a humane way, and in a way that respects their desire to support themselves through legal work.

AR003167

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-bfwb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1482

Comment Submitted by Bill Hayes

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## Submitter Information

**Name:** Bill Hayes

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## General Comment

You had my book from the beginning and you have it now positively 1000%

AR003168

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6n-u6aa <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1483

Comment Submitted by Nan Nicoll

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## Submitter Information

**Name:** Nan Nicoll

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## General Comment

You must remove arbitrary bureaucratic timelines. The Trump Administration must have enough time to thoroughly check the background of asylum seekers.  
People are suffering because of restrictive timelines. Time is of the essence.

AR003169



# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-71r7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1484

Comment Submitted by Greg Shepherd

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## Submitter Information

**Name:** Greg Shepherd

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## General Comment

How long does it take you to research the new home you want to buy or maybe that snazzy new car with that endless list of cool accessories? We should have at least that long to fins out who OUR NEW NEIGHBORS MAY BE! We need to properly vet those seeking asylum, to be sure they will be good neighbors willing to assimilate into this great country of ours not try to overthrow it, blow it up or deprive our citizens of the rights they are trying to get. Give more reasonable time to see who we are inviting into our home, or into your home, wouldn't YOU kike to have time to get to know a stranger before you invite them in?

AR003170

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-tt7c
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1485

Comment Submitted by Walter Johnston

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## Submitter Information

**Name:** Walter Johnston

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## General Comment

We have got to stop these liberal democrats in their attempts to undermine our Constitutional rights to protect this great country.

AR003171

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6p-xl35
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1486

Comment Submitted by Keith Kiser

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## Submitter Information

**Name:** Keith Kiser

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## General Comment

Support President Trump decision on immigration laws.

Stop all immigration.

AR003172

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1487

Comment Submitted by Gregory Rivers

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## Submitter Information

**Name:** gregory rivers

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## General Comment

why are these democrats so eager not to help the USA. it is their job. we need to close our borders to illegals and deport them back. they are overloading our system.

AR003173

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-ngo1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1488

Comment Submitted by David Froman

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## Submitter Information

**Name:** David Froman

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## General Comment

I am an Immigration Attorney who has practiced immigration law for more than 33 years. As a Navy JAG lawyer, I served three years as the U.S. Navy's immigration lawyer in the Pentagon. For the last seven years I have been a Certified Specialist in Immigration and Nationality Law, California State Bar Board of Legal Specialization. I hold a J.D. from the University of San Diego, and an LL.M. with emphasis in International Law from Harvard. I have represented asylum clients from Burundi, Burkina Faso, Bosnia, Egypt, Guatemala, Liberia, and Zaire and others before Asylum Officers, and in Immigration Court.

International Law sets the framework of asylum law. International Law ranks with the Constitution and laws of the United States as the "supreme law of the land." Art. VI, Cl. 2. The asylees I represented all had genuine fears to return to their countries. They fled wars of ethnic cleansing, political coups, uncontrolled gang violence, religious persecution. They are people in dire straits and great need. Thousands of years of precedent in the Bible counsels to protect the strangers within your gates, to treat them as your own people.

The 30-day rule is important in keeping adjudicators focused on the international and historical obligation to welcome those who must flee their own countries for safety. Otherwise, they would end up last on the list, particularly in a political climate that is bent on eliminating any strangers from our shores. This is not a Biblical approach, and it is hostile to that component of our law that comes from treaties and international obligations.

One used to be able to apply for employment authorization without waiting 150 days. When the 150-day wait was introduced, the 30-day rule accompanied it to make the total wait to receive an employment card 180 days. If the issue is the difficulty of meeting the 30-day deadline, then up it to 60 days and reduce the wait for filing to 120 days so the 180 day total processing time will be maintained.

Sad to say, this appears to be just one other politically motivated change to make filing asylum claims less palatable to those vulnerable persons who had to leave their homes involuntarily and their prior lives and what little possessions they had behind and trust in the goodness of humanity and the (past) reputation of America as a

AR003174

haven against oppression. This country's asylum policy over the last nearly 3 years has instead been death by a thousand cuts, nibbling away in every conceivable way at the right of asylum and the procedures to claim it.

For these and many other reasons that others knowledgeable on this subject will state, please preserve the 30-day rule.

AR003175

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1489

Comment Submitted by Donna Kramer

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## Submitter Information

**Name:** Donna Kramer

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## General Comment

Remove arbitration time lines. Support President Trump immigration reforms

AR003176

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1490

Comment Submitted by Andrea Kahn

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## Submitter Information

**Name:** Andrea Kahn

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## General Comment

With this rule, USCIS aims to remove what little protection asylum applicants are afforded while they wait, sometimes for many years, for their cases to be adjudicated. Asylum applicants are among the most vulnerable people in the world, having fled their home countries out of fear for their lives. They often have little savings and wealth. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year, harming the U.S. economy and reducing our tax base. Rather than allow asylum seekers to support themselves, this rule will delay their access to employment authorization indefinitely so that they remain insecure, without consistent access to housing, food, health care, and legal assistance. Asylum applications will be forced to work without authorization, exploited by shady employers and working off the books and without paying taxes while they wait for months or years for their asylum or employment authorization to be approved.

As a volunteer attorney, I have worked with numerous asylum applicants who spent months preparing strong asylum applications based on valid claims. Then, after submitting their applications they patiently waited 150 more days before applying for an EAD. Now USCIS would tell them they need to wait indefinitely for their EAD and they can't expect any estimated time for either their asylum application to be approved or their EAD. Asylum applicants have suffered serious persecution - we should not victimize them further with unlimited wait times and never-ending instability. Let them work so they can begin to rebuild their shattered lives.

This rule has no justification except to make life harder for already vulnerable and exploited people. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security. If USCIS needs more time to process asylum applicant EADs, then it could change the rule to allow people to apply earlier. If USCIS wants a 60-day timeframe to adjudicate I-765, then it could allow applications to be submitted after 120 days, rather than 150. This could give USCIS more flexibility without harming asylum applicants, the U.S. economy, and Medicare and Social Security.

AR003177



# PUBLIC SUBMISSION

**As of:** September 15, 2020  
**Received:** November 07, 2019  
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**Tracking No.** 1k3-9d6l-2htc  
**Comments Due:** November 08, 2019  
**Submission Type:** Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1491

Comment Submitted by Sarah Gavigan

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## Submitter Information

**Name:** sarah gavigan

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## General Comment

I am an immigration attorney and represent people who are seeking asylum.

Delays in asylum seekers getting their work authorization (Employment Authorization Document or "EAD") approval can lead to:

Lost income to the asylum seeker and their family

Food insecurity

Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID.

Risk of homelessness/housing insecurity

Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify)

Vulnerability to exploitation, trafficking, and underground economy risks

Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income)

Loss of ability to support themselves and their families

Feelings of fear, desperation, and overall mental health concerns

Proposed Alternative: As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCIS's goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR003178

AR003179

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-kif2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1492

Comment Submitted by Petra Tortorelli-Flynn

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## Submitter Information

**Name:** Petra Tortorelli-Flynn

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## General Comment

It's bad enough that sanctuary cities are allowed to exist for illegals and criminals. Give President Trump a decent time to have each person trying to enter our country be thoroughly vetted. If that takes several months or several years too bad. I don't want any kind of criminal entering our country, we have enough of our own stupid criminals and they can be jailed. No one is trying to get them 'out of jail' free. So why are your heads in the sand when it comes to ILLEGAL criminals, those people who break our laws just to get into the country. When my out of state friends find out I live in CA they always say they are praying for our state to act like decent Americans, close our borders, let ICE do the work it is supposed to do and clean up our state. People in the Senate and House from CA have absolutely no idea what we're complaining about because they use the illegals as their house cleaners. Even the people who have come to the USA legally don't like the stupidity of the democrats in office. Give us our state back, MAKE CALIFORNIA GREAT AGAIN.

AR003180

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-nvgr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1493

Comment Submitted by Carol Edward

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## Submitter Information

**Name:** Carol Edward

**Address:**

500 Denny Way  
Seattle, WA, 98109

**Email:** celaw@seattle-immigration.com

**Phone:** 206.956.9556

**Fax:** 206.956.4025

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## General Comment

Please Do Not Alter the Existing Regulation.

Prompt adjudication of asylum based work permits is critical. Persons who have suffered persecution and are allowed to be in the U.S. while their applications are pending, are not provided with food or shelter from the government, but must rely on the generosity of strangers or family members to provide for them. The 30 day rule for adjudication, provides a means of quick adjudication of the work permit, thus allowing people to legally work and support themselves. In other countries of the world, asylum seekers are provided a stipend and/or a place to live. Here in the U.S., we allow asylum seekers to work and support themselves while their case is pending and these are critical American values.

Asylum applicants already have to wait 150 days after the application is filed to receive a work permit, which gives immigration an opportunity to review the asylum applications, determine who should be interviewed promptly (and potentially be ineligible to get a work permit indefinitely).

After the 150 day delay, further delay is not appropriate. Without a timeline for adjudication these applications would take months, just like the other employment authorization requests. With the backlog in visa applications and the current slow down on review processes throughout USCIS, removing a 30 day deadline would cause a horrible burden to a person fleeing persecution and just wanting to be able to legally work in the U.S. while their case is pending.

AR003181

My knowledge of these situations is garnered from my 35 years of experience as an Immigration Attorney where I have worked with asylum seekers, family members, and business owners in pursuing legal immigration options for clients.

Thank you for considering these comments.

AR003182

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-bgg0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1494

Comment Submitted by D Lortie

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## Submitter Information

**Name:** D Lortie

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## General Comment

We must protect our borders in order to maintain our liberty and freedom for our citizens in the USA. This is a wake-up call.  
Republicans must stand by each other.  
Thank you.

AR003183

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-uhoz <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1495

Comment Submitted by Jeff Goldman

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## Submitter Information

**Name:** Jeff Goldman

**Address:**

11 Little's Point Rd  
Swampscott, MA, 01907

**Email:** jeff@jgilaw.com

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## General Comment

I have been practicing immigration law for 27 years, and have worked with hundreds of asylum seekers, almost all approved because their cases were strong and merited approval. Your proposal to remove the 30 day processing provision for EADs is one of the most cruel things I can think of. How the heck to you expect asylum applicants to eat? To find shelter? to have any measure of dignity? Stop politicizing refugees and asylum seekers!!

AR003184

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-aak3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1496

Comment Submitted by John Darden

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## Submitter Information

**Name:** John Darden

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## General Comment

A proper background check takes time !!!!

AR003185



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-cvcv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1497

Comment Submitted by David Seefeldt

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## Submitter Information

**Name:** David Seefeldt

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## General Comment

Please remove the arbitrary bureaucratic timeline from our immigration system. It is jeopardizing our national security and punishing legal immigrants who obey the law. We need legal immigrants not a broken system of chaos and disorder in America.

AR003186

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-qrhv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1498

Comment Submitted by Leslie Karam

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## Submitter Information

**Name:** Leslie Karam

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## General Comment

Asylum seekers are desperate for protection. By not providing an immediate decision on their case, it forces helpless people into needing to work to support themselves while waiting for a decision. As a nation we do not want to suppress a persons ability to work legally and support themselves while awaiting a well vetted and thoughtful process. I oppose making an asylum seeker wait longer for the ability to feed themselves and their family. Do not remove the 30 day processing rule. Instead, shorten it. Few people in the US can survive without a source of income for a month. These asylum seekers are in no position to support themselves without having legal work authorization.

AR003187

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-m51k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1499

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

It is important that EADs are processed in a timely fashion so that asylum seekers who are LEGALLY in the US and have been RELEASED from detention by ICE are able to support themselves while their cases are pending. It is impt to note that many measures have already been put in place to reduce the number of non-detained asylum seekers in the US. Therefore, those that ARE residing legally in the US awaiting the adjudication of their claim should be timely granted work authorization to reduce the burden that would otherwise exist on the system that is associated with inability to support oneself.

AR003188

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-1ef3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1500

Comment Submitted by Carol Sandusky

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## Submitter Information

**Name:** Carol Sandusky

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## General Comment

I am beyond frustrated at the ridiculous and dangerous left who will oppose any good policy that President Trump implents. They have proved that even the safety of our country is a low priority compared to destroying this administration.

AR003189

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-dbki
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1501

Comment Submitted by Nana Amoako

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## Submitter Information

**Name:** Nana Amoako

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## General Comment

Dear Sir/Madam:

I am an immigration attorney and been assisting clients on a wide variety of cases since 1986. Regardless of the type of case an applicant is pursuing, the most important immigration benefit that he or she seeks is the opportunity to obtain an employment authorization document and work legally in the US. This is especially true with asylum applicants.

Asylum applicants are by nature stressed out and have gone through painful experiences that most people would run away from if possible. They need a work permit to, among others, support their family, usually their minor children, obtain a social security card, and secure a driver's license. Asylum applicants' ability to work, and quickly, ensures that they will not depend on the public for assistance for their little ones and purchase insurance to cover their vehicles. Their ability to work positively affects the general public.

That is why it is important to continue the practice and requirement of giving them a work permit as quickly as possible. A 30-day processing period is long enough for the asylum applicant to manage; any additional delay in processing the application would injury the applicant and family.

AR003190

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-5ne0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1502

Comment Submitted by Kaywana Emerson

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## Submitter Information

**Name:** Kaywana Emerson

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## General Comment

Everyone seems to know that US immigration law is broken, but nothing has been done to rectify this. Please support President Trump's immigration reforms in an effort to fix what's broken and set right our law. Thank you.

AR003191

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6o-nxci <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1503

Comment Submitted by James Reid

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## Submitter Information

**Name:** James Reid

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## General Comment

Put AMERICA first, instead of immigrants.

There's NO NEED to rush their vetting, it's much more important to be sure they are the right choice.

AR003192

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-a90x <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1504

Comment Submitted by Georgia Wynn

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## Submitter Information

**Name:** Georgia Wynn

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## General Comment

Get with it. Do your job. Stand with our great President.

AR003193



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6o-b8nh <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1505

Comment Submitted by Rhina Slobodny

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## Submitter Information

**Name:** Rhina Slobodny

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## General Comment

Americans have had enough disrespect by people who do not belong here. We the people have the right to citizens arrest to help remove all illegals.

AR003194

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-3ice
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1506

Comment Submitted by Janet Kipe

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## Submitter Information

**Name:** Janet Kipe

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## General Comment

Please support our Presidents immigration reforms. If you arent actively protecting our country from invaders, you dont belong in our nations government work. Find another job!!

AR003195

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-51c2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1507

Comment Submitted by Patrick Gonzales

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## Submitter Information

**Name:** patrick gonzales

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## General Comment

Support Mr. Trump reform !!!!!

AR003196

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-hu9v <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1508

Comment Submitted by Terry Thomas

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## Submitter Information

**Name:** Terry Thomas

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## General Comment

You need to wake up and pass these bill.

AR003197

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-eny8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1509

Comment Submitted by Boguslaw Stecko

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## Submitter Information

**Name:** BOGUSLAW STECKO

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## General Comment

PLEASE?JUST GET READY WITH THIS CRAP FROM DEMOCRATS,JUDGE THEM AND THROW THEM IN JAIL, TRAITORS OF PROSPEROUS COUNTRY SHOULD BE IN PRISON, SCUBAGS PELOSI AND OTHER ENEMIES OF USA, SAME IM IMIGRANTS,USA NEED ONLY POLITICAL REFUGIES AND POLISH THE BEST AMERICA FFRIENDS

AR003198

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-gmor
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1510

Comment Submitted by Lisa Seifert

---

## Submitter Information

**Name:** LISA SEIFERT

**Address:**

626 Columbia St. NW, Suite 1A

Olympia

Olympia, WA, 98501

**Email:** LISA@SEIFERTLAW.COM

**Phone:** 3603577087

---

## General Comment

Hello. Lets make sure that asylum seekers, like other immigrants can stand on their own two feet and work to support themselves. They wont be able to do that without work permits. Its important that -- while we make these applicants wait for decisions -- that we give them the ability to support themselves and family members.

AR003199

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-ief0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1511

Comment Submitted by Shelton Davis

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## Submitter Information

**Name:** Shelton Davis

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## General Comment

Take your pacifiers out of your mouth change your diapers and help President Trump get immigration reform passed thank you

AR003200

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6o-kf3y <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1512

Comment Submitted by Debbie Wise

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## Submitter Information

**Name:** Debbie Wise

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## General Comment

Support President Trumps immigration reforms now please for our safety. Most people dont have a wall to hide behind to keep our families safe. Save our Country!

AR003201



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-uzi3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1513

Comment Submitted by Billy Hoffman

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## Submitter Information

**Name:** Billy Hoffman

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## General Comment

Support President Trump in his efforts to keep our nation secure!

AR003202

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-empl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1514

Comment Submitted by John Boyer

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## Submitter Information

**Name:** John Boyer

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## General Comment

30 days to review an asylum applicant's request for a work permit is way too short and is not feasible. Please allow at least 120 days or whatever Trump's administration requests.

AR003203

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-fh4q
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1515

Comment Submitted by Suzanne Clark

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## Submitter Information

**Name:** Suzanne Clark

---

## General Comment

Please support President Trump's Immigration reforms and allow sufficient time to vet all asylum seekers. Thirty days is not adequate. There should be no limits on time taken to complete vetting. To limit time taken for vetting is to place US security in jeopardy.

AR003204

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1516

Comment Submitted by Carol Wilkerson

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## Submitter Information

**Name:** Carol wilkerson

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## General Comment

Plelae support President Trump on this.

AR003205

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1517

Comment Submitted by Byron Bingham

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## Submitter Information

**Name:** Byron Bingham

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## General Comment

The US citizens are tired of supporting illegal immigrants. Quit spend Social Security money on those that haven't paid a cent into Social Security. It is NOT government money. It is not money for the Liberal SOB's to give away.

AR003206

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6r-7hp7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1518

Comment Submitted by Lou Di Leonardo

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## Submitter Information

**Name:** Lou Di Leonardo

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## General Comment

Immigration is NOT a right, it IS a privilege that is to be bestowed on people who deserve it and who will be a benefit to the US. Democrat policies and hatred for this country have given us a crises that we may never survive. Support Trump and Build that Wall. Then, search for and deport anyone here ILLEGALLY.

AR003207

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-ief7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1519

Comment Submitted by Paul Kubisiak

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## Submitter Information

**Name:** Paul Kubisiak

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## General Comment

WE THE PEOPLE insist you start supporting President Trumps Immigration Reforms.

AR003208

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1520

Comment Submitted by Alexandra Bonazoli

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## Submitter Information

**Name:** Alexandra Bonazoli

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## General Comment

For the last six years I have worked as an immigration attorney in MA, providing pro bono legal representation to asylum seekers. I represent asylum seekers from around the world who have fled persecution to seek asylum in the US. In the course of representation, we assist all eligible clients with applications for work authorization. I submit this comment in OPPOSITION to the proposed rule "Removal of 30-day Processing Provisions for Form I-765 (c)(8) Employment Authorization Applications," DHS Docket No. USCIS-2018-0001. This proposed rule would eliminate the requirement that DHS adjudicate initial requests for EADs by asylum applicants with 30 days of filing. I oppose this rule for 4 reasons. FIRST, this rule would have serious negative impacts on the ability of asylum seekers to support themselves and their families while waiting for their claims to be heard. SECOND, preventing asylum seekers from securing lawful employment is not in the US's economic interest. THIRD, DHS's near total compliance with the Rosario decision shows that it is capable of adjudicating these applications within 30 days. FOURTH, DHS's concerns of fraud are unfounded given its existing systems for fraud detection and security checks.

1. An asylum seeker is, by definition, a person who has suffered significant harm, including torture and sexual violence, on account of a protected ground and who flees his or her country with very few physical possessions or financial resources. They arrive in the US seeking support and protection. However, even under the existing system, asylum seekers bear the burden of extensive backlogs. Many asylum seekers wait years for their applications to be heard and then adjudicated. And, asylum seekers must already wait a lengthy 180 days from the date of filing their application before they can apply for a work permit. During this time they must rely on relatives or charity for support necessary for their survival. One of my clients, who fled extreme gang violence in Honduras, was initially unable to apply for an EAD because of a clock issue - her 180 day EAD clock did not run for nearly the first two years that her application was pending. During those two years she was wholly dependent on her in-laws for financial support for herself and her children. When her clock issue was resolved and the clock began to run again, she was able to apply for an EAD. Receiving that EAD changed her life. Being able to work lawfully enabled her to reduce her dependence on her parents-in-law. She finally regained the ability to pursue stability for her family through work, and began to put her life back together after threats of violence destroyed her family's sense of safety. On the day when I gave her the approved EAD, she cried with relief. My client's

AR003209



experience illustrates how critical the independence made available by an EAD truly is. But her long wait time to be eligible for work authorization also exemplifies what would happen if this rule goes into effect. With no 30-day approval rule the Department of Homeland Security would have no incentive to adjudicate these application in a timely manner. Countless families would be left with no means to support themselves, and no expectation of how long they would need to wait in limbo before being able to work lawfully.

2. Ensuring that asylum seekers can secure lawful employment as soon as possible is in the economic interest of the US. According to the Dept. of Health and Human Services, refugees and their family members contributed more than \$343 billion in revenue to federal, state and local govts. And, refugees contributed \$63 billion more than they received in benefits from various programs. The US economy benefits hugely from this population that works so hard when given a chance and permission to work.

3. In July 2018, the U.S. District Court for the Western District of Washington ruled that USCIS must adjudicate asylum seekers initial applications for an EAD within 30 days, as is specified at 8 C.F.R. 208.7(a)(1). As part of the ruling, USCIS was ordered to submit reports showing compliance with the 30-day requirement. In August 2019, DHS reported that it has been adjudicating 99% of asylum seekers initial EAD applications within 30 days. This near total compliance with the order shows that DHS is able to comply with the 30-day adjudication requirement set forth in 8 C.F.R. 208.7(a)(1).

4. DHS voiced concern about fraud related to the adjudication of EADs based on asylum applications, and cited this as a justification for the proposed change. However, if DHS has a concern about an individual or particular application, then it should quickly process and investigate the application, rather than create delays for all asylum seekers. As mentioned above, DHS currently decides over 90% of the EAD applications within the 30-day processing timeline, demonstrating that DHS is able to address fraud and security concerns within the current time frame and process.

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1521

Comment Submitted by Mary Waltermire

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## Submitter Information

**Name:** Mary Waltermire

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## General Comment

The regulation requiring USCIS to adjudicate within 30 days initial asylee employment authorization documents should NOT be changed. Background checks are initiated after an asylum application is filed, months before the application for employment authorization can be filed, so there is no national security basis for changing this rule. Asylum applicants must still wait 180 days after filing their applications before they can receive employment authorization. They need to be able to work while waiting for a decision on their applications if USCIS cannot adjudicate those applications within 150 days. To delay employment authorization for asylum applicants will increase the risk of homelessness, lack of food, and potentially create substantial social problems for individuals who have no means to support themselves. This will create a greater burden on state and local governments. Moreover, it will cause more asylum applicants to either work without employment authorization in the underground economy or turn to individuals who manufacture false documents or sell identity information. This reduces tax revenue and increases crime (production of false documents and identity theft). Given the automation and centralization of the production of employment authorization cards over the last number of years, it should take USCIS less time rather than more time to produce documents. USCIS could, instead, allow an individual to apply 90 or 120 days after filing for asylum and then allow USCIS to take 60 or 90 days to complete card production.

I oppose this proposed regulation change. It is unnecessary, will have a number of harmful effects on people and communities in the U.S.

AR003211

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1522

Comment Submitted by Rogenia Thurman

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## Submitter Information

**Name:** Rogenia Thurman

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## General Comment

It's time to stop partisan politics and pass immigration reform. I'm sure that won't happen but at least allow our president the ability to keep us safe. Time frames are ridiculous with an issue so important.

AR003212

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6r-f3mv <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1523

Comment Submitted by Raleigh Minard

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## Submitter Information

**Name:** Raleigh Minard

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## General Comment

do your job and help set up the proper way of immigration. follow Trump.

AR003213

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1524

Comment Submitted by Adrian Garcia, Harris County Precinct 2 Commissioner

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## Submitter Information

**Name:** Adrian Garcia

**Address:**

1001 Preston Suite 924

Houston, TX, 77002

**Email:** andrea.elizondo@pct2.hctx.net

**Phone:** 7133203799

**Submitter's Representative:** Andrea Elizondo

**Organization:** Harris County Precinct 2

**Government Agency Type:** Local

**Government Agency:** Harris County

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## General Comment

See attached file(s). Letter from Harris County Precinct 2 Commissioner Adrian Garcia.

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## Attachments

USCIS EAD Rule Letter

AR003214



**ADRIAN  
GARCIA**  
COMMISSIONER

1001 Preston, Suite 924  
Houston, Texas 77002  
713-755-6220

October 23, 2019

Department of Homeland Security  
U.S. Citizenship and Immigration Services  
Office of Policy and Strategy  
Chief, Regulatory Coordination Division  
20 Massachusetts Avenue, NW  
Washington, D.C. 20529-2140

**RE: Comments on Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications**

Dear Mr. Kenneth T. Cuccinelli,

I am writing to you in opposition of the new proposed rule on the removal of the 30-day provision for employment authorization documents (EAD or Form I-765) filed by asylum applicants.

I represent Harris County Precinct 2, which covers the east side of Harris County. Precinct 2 is home to 1.2 million residents and covers 559 square miles of the county. Our precinct includes 15 cities and 12 school districts. Within the unincorporated area of the precinct reside 290,800 residents, for whom Harris County is the primary provider of services.

The proposed change will have detrimental effect on the 26,900 asylum applicants (estimate from Migration Policy Institute) that live in the Greater Houston Area. Harris County and Precinct 2 have a culturally diverse population that is economically dependent on the work and talents of immigrants including asylum seekers. Immigrants have made our region the fastest and the most thriving urban area in the country. Asylum seekers have gone through hell to initiate their new beginnings in Precinct 2, and they have the resiliency and the grit to succeed along with their new communities therefore, this proposed administrative change is a deterrence to their success as thriving new members of our communities.

Asylum applicants already have to wait 150 days after filing for asylum before they are permitted to file for their EAD applications. Then they have 30 days to receive their EADs, which is already a total of 180 days or approximately 6 months to get work authorization. The

AR003215

proposed rule will complicate the ability to legally work by eliminating the 30 day deadline for USCIS to process EADs. It is ironic for a federal administration that likes to promote “self-sufficiency” and “rule of law”, to want to hinder the process for asylum applicants to have the ability to be self-sufficient through legal work.

USCIS claims that this proposed rule is to reduce fraud and to eliminate the backlog. Eliminating the 30-day processing provision will not fix current administrative deficiencies nor the backlog. The agency should focus on getting a budget proposal to increase their funds to hire more staff to reduce the backlog and eliminate other administrative issues. Another solution to solve the backlog would be to allow asylum applicants to file their asylum applications and EAD applications simultaneously. This solution would allow the agency to have more than enough time to complete screenings and background checks within a reasonable timeframe.

Not only would asylum applicants be impacted by this proposed rule but, businesses would be impacted as well. Asylum applicants would face delays into entering the workforce, which is a loss of income for them, and a loss of tax revenue and spending power. Not being able to legally to work sooner than later puts asylum applicants in a vulnerable position of experiencing homelessness and/or labor trafficking. Not only does this impact their ability to work but, it will also make it difficult for them to apply for a state-issued identification card/driver’s license, which limits their ability for personal transportation and banking. We are currently working on implementing more efficiently multi-modal transportation system but, we are not there yet. Unfortunately, Harris County has transportation disparities that people need to desperately have a vehicle to get by. Asylum seekers would need access to get a Driver’s License to succeed in our region. Not having the ability to do all of these necessary activities makes it harder for asylum applicants to integrate in their new local communities.

This proposed rule change places a burden on a vulnerable population, asylum applicants, which is why I am strongly oppose to it. I request that this rule to be withdrawn and find other solutions to solve the EAD backlog.

Respectfully,

A handwritten signature in black ink, appearing to read "Adrian Garcia". The signature is fluid and cursive, with the first name "Adrian" being more prominent than the last name "Garcia".

Adrian Garcia  
Harris County Precinct 2 Commissioner

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1525

Comment Submitted by Violeta Haralampieva, Political Asylum/Immigration Representation

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## Submitter Information

**Name:** Violeta Haralampieva

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## General Comment

DHS Docket No.: USCIS-2018-0001  
84 F.R. 47148

November 7, 2019

To Whom It May Concern:

My name is Violeta Haralampieva and I am Staff Attorney at the Political Asylum/Immigration Representation (PAIR) Project in Boston, Massachusetts. I respectfully submit this comment to the Department of Homeland Security's Notice of Proposed Rulemaking on Removal of the 30-Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications, USCIS-2018-0001, issued on September 9, 2019.

For the past 30 years, our organization has provided free legal representation to indigent asylum seekers, including detained immigrants, and ensured crucial access to counsel for asylum seekers through our wide network of volunteer attorneys. Over the years, PAIR has represented thousands of asylum seekers from all over the world. Each year, we help over 100 clients with initial Employment Authorization Document (EAD) applications.

As an immigration lawyer who works with the poorest asylum seekers, I am submitting this comment in opposition to the Proposed Rule Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications (Sep. 9, 2019), DHS Docket No. USCIS-2018-0001 (hereinafter, the Rule). The Rule would eliminate the requirement that DHS adjudicate initial requests for employment authorization by asylum applicants within 30-days of filing. The Rule will have significant and long-lasting negative effects on the ability of PAIRs asylum clients to support themselves and their loved ones while they are waiting for their claims to be heard.

AR003217



By definition, an asylum seeker is an individual who has suffered grave harm, including death threats, torture, and sexual violence on account of a statutory protected ground, and who flees his or her home country with very few possessions and little support or financial resources. Asylum seekers turn to the U.S. for a safe haven and protection--in other words, to save their lives. This rule to eliminate the 30-day processing time for work authorization will undermine asylum seekers ability to sustain themselves. The proposed rule change will allow DHS to have unlimited time to decide if and when asylum seekers will be issued work authorization, during which time asylum seekers would have no means of supporting themselves and be forced to wait and survive on the charity of others. The Rule will only compound the devastating delays that many asylum seekers face. DHS, which suffers backlogs in almost every benefit category, will have no incentive to issue a prompt decision.

During my time as an asylum lawyer, I have witnessed our clients' incredible bravery in working to overcome the worst kinds of physical and psychological trauma in a new country while often being separated from their spouses and children for years while waiting for their asylum applications to be processed. I have also witnessed their unshakeable determination to rebuild their lives despite all the odds against them, become self-sufficient, and provide for their families, which happens to be one of the fundamental values on which our nation was built. For a person who has not been in close contact with asylum seekers, it might be hard to imagine what it is like trying to rebuild one's life from zero in a foreign country after fleeing to save one's life, while being unable to legally work for six months after applying for asylum and not having a right to access any public benefits. During the legally required wait time before they can obtain their work cards, most of our clients survive only thanks to the charity of a few nonprofit organizations and of compassionate individuals who open their homes and hearts, so that these extremely vulnerable people would not wind up on the street. Once they have their work authorizations, our clients work hard to support themselves and boost our economy in every cognizable field. They work as cooks, nurses, photographers, IT specialists, college professors, and entrepreneurs, among many others. The uncertainty of not being able, at the very least, to have a clear understanding of when they can expect to get their work authorization documents is an additional blow to asylum applicants' ability to become self-sufficient, as well as a completely unnecessary burden on them, the people who support them in those initial months in the United States, and our economy. DHS's self-reported ability to adjudicate 99% of initial EAD applications by asylum seekers within the required 30-day period proves that DHS is able to successfully comply with the requirement set forth in 8 C.F.R. 208.7(a)(1). Processing applications more quickly is also in the interests of national security.

Therefore, I respectfully request that USCIS continue processing asylum-based EAD applications pursuant to its current policy and practices that require adjudication within 30 days of filing.

Sincerely,

Violeta Haralampieva, Esq.

AR003218

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1526

Comment Submitted by Robert Barker

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## Submitter Information

**Name:** Robert Barker

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## General Comment

No timelines restraints for Immigration Reviews. Some investigation must take time for vetting those we want in this country. Please do the right thing for our citizens.

AR003219

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1527

Comment Submitted by Patricia Galloway

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## Submitter Information

**Name:** Patricia Galloway

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## General Comment

It is extremely risky to limit the time to adequately screen the backgrounds of Asylum seekers! The safety and security of Americans must come first, and is jeopardized by arbitrary and bureaucratic timelines that force dangerous shortcuts. Please remove this dangerous and arbitrary timeline for screening asylum seekers!

AR003220

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1528

Comment Submitted by Anita McMurtrey

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## Submitter Information

**Name:** Anita McMurtrey

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## General Comment

I am asking you to support President Trump's immigration policies. Keep Americans safe and remove this arbitrary bureaucratic timeline.

AR003221

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6l-ntj9
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1529

Comment Submitted by Sandie Harris

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## Submitter Information

**Name:** Sandie harris

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## General Comment

You must support our President, who is trying to secure our land. Imagine if democrats worked with him, or even worked instead of trying to invade our land with illegals n criminals. Why are you in Government against your own land. Greed n control is your only agenda, not work with our President .. he is the only one working past 3 years

AR003222

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1530

Comment Submitted by Kevin Arendt

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## Submitter Information

**Name:** Kevin Arendt

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## General Comment

Lets get President Trumps immigration reforms dome. Lets protect America and its people who pay your salary.

AR003223

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1531

Comment Submitted by Marie Anderson-Wollum

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## Submitter Information

**Name:** Marie Anderson-Wollum

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## General Comment

WE NEED IMMIGRATION REFORMS.

AR003224

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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-mf4a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1532

Comment Submitted by Anonymous

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Implementing this policy is another tactic to scare people from applying for asylum as it creates financial insecurity and hopelessness.

AR003225



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-sckk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1533

Comment Submitted by Abigail Sullivan Engen

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## Submitter Information

**Name:** Abigail Sullivan Engen

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## General Comment

I am an attorney at a nonprofit legal services organization in Oakland, California.

I ask that you not eliminate the 30-day adjudication rule. Work authorization is crucial for asylum applicants to be able to survive and adapt to life in the United States as they await the resolution of their asylum claims.

This proposed rule change is simply the next in a line of hostile policies aimed to further harm fleeing persecution in their countries of origin. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude.

The notice regarding the rule change states: "This change is intended to ensure USCIS has sufficient time to receive, screen, and process applications for an initial grant of employment authorization based on a pending asylum application." If USCIS's goal is to have more time to process each request, a much more reasonable solution would be shortening the waiting time before asylum-seekers are allowed to submit their application. Rather than forcing asylum seekers to wait 150 days to submit their I-765s, they can submit them in conjunction with or anytime following the I-589, allowing USCIS six months to review and adjudicate the I-765.

AR003226

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-pje9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1534

Comment Submitted by Patricia Weed

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## Submitter Information

**Name:** Patricia weed

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## General Comment

It is time to put politics aside and work with President Trump on fixing the broken immigration laws of our Great. Country. Lives are being severely affected by all the political fighting.

AR003227

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6q-a5sk <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1535

Comment Submitted by Don Williams

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## Submitter Information

**Name:** Don Williams

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## General Comment

What's the rush they dont rush anything, so why the rush on this .

AR003228

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-ld07
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1536

Comment Submitted by Kathryn Capron

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## Submitter Information

**Name:** Kathryn Capron

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## General Comment

We need to support our Great President and not allow more illegals into this country. If this is not done, we will no longer have an America.

Am sick and tired of the liberal Dems. telling us how racist we are for protecting our borders.

AR003229

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-z4ka <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1537

Comment Submitted by Jerry Stiles

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## Submitter Information

**Name:** Jerry Stiles

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## General Comment

All you Democraps are nothing but stinking pigs,,

AR003230

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-m9eq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1538

Comment Submitted by Bob Gerry

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## Submitter Information

**Name:** Bob Gerry

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## General Comment

Make our country safe!

AR003231

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-sd6m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1539

Comment Submitted by CHristine Malumphy

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## Submitter Information

**Name:** CHristine Malumphy

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## General Comment

As a law student, I represented a proud and hard-working asylum-seeker who had been conscripted into forced military service by threat of violence and rape. His case took years to conclude and he was given asylum. It is senseless to preclude such people from working and paying taxes while they seek refuge.

AR003232

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-ulm7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1540

Comment Submitted by Susan Kelley

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## Submitter Information

**Name:** Susan kelley

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## General Comment

Support our presidents immigration reform. People are being murdered. Vetting is necessary.

AR003233



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-gdgz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1541

Comment Submitted by Barbara Delach

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## Submitter Information

**Name:** Barbara Delach

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## General Comment

Very short, support President Trump's immigration reforms. The first duty of the federal government is to protect it's citizens. Do your job!

AR003234

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-gnz7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1542

Comment Submitted by Immigration Law Clinic University of Washington

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## Submitter Information

**Name:** Immigration Law Clinic University of Washington

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## General Comment

Please see attached document.

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## Attachments

Comment

AR003235

November 7, 2019

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, DC 20529-2140.

*Via on-line submission*

Re: Comment on Proposal to Eliminate the 30-day initial asylum EAD rule  
DHS Docket No. USCIS-2018-0001

The Immigration Law Clinic at the University of Washington School of Law (“the Immigration Law Clinic” or “the Clinic”) respectfully submits this comment in response to the U.S. Department of Homeland Security’s Notice of Proposed Rulemaking on Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

The Clinic is comprised of eight law students and a supervising attorney/instructor who work on cases for individuals who would otherwise lack legal representation in their immigration cases. Clinic students work on a wide variety of immigration issues: assisting individuals seeking asylum, representing detained individuals facing removal orders, and helping children seeking special immigrant juvenile status.

The proposed rule change is intended to allow for operational flexibility, but its benefits are vague and unsubstantiated. Specifically, this rule will cause systemic harm to asylum-seekers, the government, and national security interests. Furthermore, it is clear that this rule change is part of a reprehensible effort by the Trump administration to broadly deter immigrants and asylum-seekers.

**Harm Caused to Asylum-Seekers.** Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

**Lost Tax Revenue for the Government.** USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum-seekers and their employers from contributing to Medicare and social security.

**Increased Delay Contrary to National Security Interests.** In the notice, USCIS makes frequent reference to a rise in national security threats as a reason to spend more time and resources on each decision. However, USCIS has reported that it has been able to decide over [99% of EADs within the 30-day timeframe for over the past year](#). Therefore, USCIS has proven its ability to adequately vet the amount of requests in a timely fashion. Moreover, its argument regarding increased threats serves only to prompt the need for a speedier process to properly protect national security, rather than its request to delay the process further. This need for a speedier process is further compounded by the fact that the EAD applicants are asylum-seekers already residing in the United States. If vetting must be done to prevent security risks, then having unvetted people in the U.S. subjected to a potentially indefinite review period seems contrary to the department's stated interests.

**Part of a Systematic Effort to Deter Asylum Seekers.** This proposed rule change is part and parcel of this administration's effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

**Proposed Alternative:** As the law is currently written, asylum-seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCIS's goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

Respectfully submitted,

/s/

Paula Luu  
Andy Paroff  
Rebekah Ross  
Zachary Rentschler  
Derek Tsang  
Jeremy Olson  
Danielle Coony  
Nicci Arete  
Christopher Strawn

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-5r28
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1543

Comment Submitted by David Capron

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## Submitter Information

**Name:** David Capron

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## General Comment

Please remove the arbitrary 30 day bureaucratic timeline for vetting asylum seekers to the USA. This ridiculous rule enacted any an unelected bureaucrat make this country less safe. Please fire the people responsible for instituting this.

Support President Trump in his efforts to keep Americans safe.

AR003238

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-1bvs
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1544

Comment Submitted by Georgina CAmacho

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## Submitter Information

**Name:** Georgina CAmacho

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## General Comment

As a person who went through a clear process to be eligible to become American, I urge you to comply with immigration laws to protect America from people who should not stay here, and to help people who should stay, do so.

AR003239

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-uqrh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1545

Comment Submitted by Judy Hill

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## Submitter Information

**Name:** Judy Hill

---

## General Comment

I stand by President Trump

AR003240

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-daoo
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1546

Comment Submitted by William Mead

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## Submitter Information

**Name:** William Mead

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## General Comment

We must vet all who enter our country and keep all out until they can be thoroughly vetted... only fools would disregard this

AR003241



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-etaf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1547

Comment Submitted by Vanessa Avila

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## Submitter Information

**Name:** Vanessa Avila

**Address:**

944 E. Gorham Street  
Madison, 53703

**Email:** vanessa@cilcmadison.org

**Phone:** 608-640-4444

**Fax:** 608-640-4447

---

## General Comment

My name is Vanessa Avila and I am an immigration attorney. I work at the Community Immigration Law Center.

I am here to ask you continue to provide an Employment Authorization Document to asylum seekers within 30 days of their application.

Asylum seekers are the most vulnerable population. Generally, they are not eligible for any public benefits. This population needs to work to support themselves, and as such, work permits are vital to their livelihood.

In the interest of the US government, work permits almost ensures this population will pay taxes. The income is documented via a W-2. The US government can track each persons income and make sure they pay their fair share. Without a work permit, this population will work under the table and their income cannot be document, permitting them to bypass taxes.

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

It is to the benefit of the asylum seeker and the US government to continue issuing work permits within 30 days of their application.

Sincerely,

AR003242



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-bmfi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1548

Comment Submitted by Leslie Anchors

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## Submitter Information

**Name:** Leslie Anchors

---

## General Comment

We must take the necessary time it takes to fully investigate asylum seekers. We must know who they are and why they are here.

AR003244

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6q-crtm <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1549

Comment Submitted by David Emery

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## Submitter Information

**Name:** David Emery

---

## General Comment

Please do not permit any fast tracking of the background checks for immigrants. Whoever wrote the ridiculous timeline obviously works for the deep state and should be dismissed from their position. KEEP AMERICA SAFE !!!

AR003245

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-3opp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1550

Comment Submitted by Sharon Rosenwald

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## Submitter Information

**Name:** Sharon Rosenwald

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## General Comment

Support President Trumps immigration reforms. Give more time for checking out asylum seekers.

AR003246

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-o3he
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1551

Comment Submitted by Oreva Lessard

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## Submitter Information

**Name:** Oreva Lessard

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## General Comment

Please do not change the way #Trump is allowing Asylum Seekers come thru the process!

Too much evil, illness and other things coming through!

Please support #Trump on this!

AR003247

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-axw8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1552

Comment Submitted by Berton Young

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## Submitter Information

**Name:** Berton Young

---

## General Comment

Omit the time limit arbitrarily concocted for the interviewing of the border breakers and unlawful border crossers.

AR003248

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-zgoa
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1553

Comment Submitted by Wanda Wyatt

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## Submitter Information

**Name:** Wanda wyatt

---

## General Comment

Why are you not supporting the ones who are doing it the legal way? Why do you honor law breakers? You put the rights of the illegal alien above the legal rights of the us citizen. Why? I support the ones who are trying to do it the legal way. NO! I DO NOT SUPPORT THE ILLEGAL LAW BREAKERS! And neither should you. You are not for America. Why are the foreign countries not taking responsibility for their people? Why do we the tax payers have to support them? This is wrong and you know it. I will not vote for any of you who support illegals over us citizens--especially the homeless and veterans. Why are you not helping them? Shame on you!

AR003249



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-ow52
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1554

Comment Submitted by Sally Hancock

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## Submitter Information

**Name:** Sally Hancock

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## General Comment

More security is needed at the border before letting anyone in, especially after what happened at the border this last week.

AR003250

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-81pq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1555

Comment Submitted by Richard Jakubec

---

## Submitter Information

**Name:** Richard Jakubec

---

## General Comment

Trump Administration needs time to thoroughly check the background of every asylum seeker. Tell DC to help President Trump secure Americas safety by removing this arbitrary bureaucratic timeline.

AR003251

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-xokq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1556

Comment Submitted by DJ Meinerding

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## Submitter Information

**Name:** DJ Meinerding

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## General Comment

It has been increasingly difficult to be granted asylum in our country. Once granted, our government should help set rules that help the refugee find work that will enable he/she to adequately care for themselves and other family members. We should recognize that a working asylum seeker is good for our economy and creates revenue via taxes. There is no good reason to lengthen the waiting period before a refugee can begin work. If more time is needed to review applications, say 60 days, then change the 150 day wait period required before applying to 120.

AR003252

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-neon
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1557

Comment Submitted by Natalie Tamburello

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## Submitter Information

**Name:** Natalie Tamburello

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## General Comment

Do NOT set a limit for American's safety

It doesn't matter how long it takes. We as citizens need to feel safe in our country.

Look at the shooting yesterday by the Cartel- all those innocent people are dead. I do not want cartel members living in my area.

AR003253

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-6o6b
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1558

Comment Submitted by Marit Gurley

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## Submitter Information

**Name:** Marit Gurley

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## General Comment

I am an immigration attorney in Bloomington, Minnesota. I am strongly opposed to this proposed rule to further lengthen the amount of time that asylum seekers are unable to work. In my practice, I have witnessed asylum seekers languishing at home without work authorization while they have the skills needed so desperately by many businesses trying to hire unskilled workers for entry-level jobs that struggle due to our low unemployment rate. These asylum seekers become unproductive members of society during this time, unable to support themselves or their families. Many of them are even unable to find food to eat and must rely on our food shelves as their resources. These are the most vulnerable members of society - they have suffered persecution and violence. The loss of income during this time means that asylum seekers will only find it that much more difficult to get on their feet. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The government is forcing these individuals to likely end up with no choice but to rely on government aid.

AR003254

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-r9i6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1559

Comment Submitted by William Cato

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## Submitter Information

**Name:** William Cato

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## General Comment

Please stop illegal immigration now we do not need any more criminals in our country

AR003255

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-kfv6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1560

Comment Submitted by Roger Deal

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## Submitter Information

**Name:** Roger Deal

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## General Comment

I am in highly in favor of supporting President Trump's Immigration Reforms.

Instead of giving the Trump Administration enough time to thoroughly check the background of every asylum seeker, they're being forced to cut corners and make America less safe, just because bureaucrats wrote a ridiculous timeline.

We NEED to secure America's safety.

The existing radical restrictions jeopardize our national security and punish LEGAL immigrants for obeying our laws.

Democrats just want to keep them in place, all so they can keep our immigration system broken and undermine Donald Trump's presidency.

AR003256

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6o-8pf2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1561

Comment Submitted by Scott Miller

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## Submitter Information

**Name:** SCOTT MILLER

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## General Comment

PROTECT OUR BORDERS OR AMERICANS START SHOOTING IMMIGRANTS AND LIBERALS.

AR003257



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-xx9x
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1562

Comment Submitted by Cheryl Bowman

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## Submitter Information

**Name:** Cheryl Bowman

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## General Comment

Please give the Trump Administration enough time to thoroughly check the background of all asylum seekers. By cutting corners, they are making our country less safe.

AR003258

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-e560
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1563

Comment Submitted by RL Daigle

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## Submitter Information

**Name:** RL DAIGLE

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## General Comment

DC, Do your job and help president Trump secure our nation. Stop making America less safe. We must do thorough background checks on asylum seekers. America will not forget or forgive the democrats in Washington for opposing everything this president does to secure our nation. We will vote you all out of office and vote for people who love our country and want to be safe.

AR003259

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-5vxt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1564

Comment Submitted by Dami Hughes

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## Submitter Information

**Name:** Dami Hughes

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## General Comment

Keep immigration reform to keep out the Criminals and keep us citizens safe!!!!

AR003260

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-uji6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1565

Comment Submitted by Geoffrey Marlette

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## Submitter Information

**Name:** Geoffrey Marlette

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## General Comment

It is a crime against the security and safety of our country and citizens to allow immigrants enter our country without sufficient time to do a thorough check on their background and history. Our lives are at stack. Help protect our most valuable assets, our great country of USA and its legal citizens!

AR003261

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-3haw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1566

Comment Submitted by Susan Benjamin

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## Submitter Information

**Name:** Susan Benjamin

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## General Comment

I ask as a American citizen who comes from a long family of WW1,WW2,Koren war veterans who fought for our constitution and country. Please support our president in his fight for our country. Please support Immigration reforms by our President Trump. Thank you

AR003262

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-rn8j
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1567

Comment Submitted by Paula Peters

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## Submitter Information

**Name:** Paula Peters

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## General Comment

Build the Wall. Stop illegals from crossing the border. Deport all illegals. Stop sanctuary cities!

AR003263

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-f9dc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1568

Comment Submitted by Diane DeLallo

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## Submitter Information

**Name:** Diane DeLallo

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## General Comment

Please stop obstructing our president on immigration policies and reforms. We the people want our borders secure and our country safe.

AR003264

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-zvo8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1569

Comment Submitted by Barbara Fisette

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## Submitter Information

**Name:** Barbara Fisette

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## General Comment

While there is a problem with immigration, I support President Trump and ask you to stop the negative moves to block his efforts.

AR003265



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-fkmu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1570

Comment Submitted by Linda Mclucas

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## Submitter Information

**Name:** Linda Mclucas

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## General Comment

To make sound judgements on the back ground of those applying. Adequate time is needed. We don't want those who are not intending to do harm. I'm asking that President Trumps Immigration Reforms are honored.. I trust his judgement. Not those who are showing themselves to be law breakers. Thank you.

AR003266

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-rq14
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1571

Comment Submitted by Annie Hill

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## Submitter Information

**Name:** Annie Hill

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## General Comment

Please support President Trump's immigration reforms. Put America and American citizens first. So get out of his way.  
Thank you.

AR003267

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-u2iu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1572

Comment Submitted by Beth Sherill

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## Submitter Information

**Name:** Beth Sherill

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## General Comment

You were voted in office by american citizans do your job keep american people safe we are legal and pay your salaries shame on u get to know god the true god and u will do whats right legal or stop getg a pay check u represent us not them stop having 2 sets rules

AR003268

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-zoiy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1573

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

To Whom It May Concern:

I reach out to comment AGAINST the proposed rule change related to DHS Docket No. USCIS-2018-0001. Please do not implement this proposed rule change that will negatively impact Asylum Seekers, the most defenseless and vulnerable among us. Welcoming Asylum seekers is one of the many attributes that makes America a great and strong country. As taxpayers and workers, asylum seekers and their children contribute to our economy and proudly serve in our military.

Please do not eliminate this important regulatory provision. Without this 30 day provision asylum seekers will be unable to support themselves due to delayed work authorization, which will have all sorts of negative effects.

Thank you for your consideration.

AR003269

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-j4jt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1574

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am opposed to eliminating the thirty-day deadline for deciding applications for employment authorization that are filed by asylum-seekers. I believe that people who want to work should have the opportunity to do so--or at least have the applications for it decided--and not be forced to rely on public benefits. When the government refuses to allow asylum-seekers to work, it makes them vulnerable to exploitation (and they are already a vulnerable group). They often have children, who will also suffer. And from a purely selfish standpoint, the government loses taxes.

Asylum-seekers will already have waited 150 days for a decision--any further delay is the government's fault. And apparently USCIS is entirely capable of meeting the 30-day deadline, since it has successfully done so for years now. Finally, I don't see what this has to do with national security. That excuse is trotted out for all delays in deciding any benefit for people who are not citizens.

AR003270

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-qdau
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1575

Comment Submitted by Colleen Giles

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## Submitter Information

**Name:** Colleen Giles

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## General Comment

The timeline issued for the support of the President's Immigration Reforms is clearly an effort stop his good intentions. We love America and we want to uphold our founding principles. Please remove this timeline for the good of all freedom loving people.

AR003271

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-i8mq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1576

Comment Submitted by Robert McCroskey

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## Submitter Information

**Name:** Robert McCroskey

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## General Comment

Our immigration law is not working. Congress needs to work on reform immediately and they need to fulfill their oaths of office and support the President of the United States of America.

AR003272

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-92x9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1577

Comment Submitted by Joyce McCubbin

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## Submitter Information

**Name:** Joyce McCubbin

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## General Comment

Support Immigration REFORM. Employers must use E-verify. Deport noncitizen Criminals!

AR003273



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-eunj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1578

Comment Submitted by Ari Peskoe

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## Submitter Information

**Name:** Ari Peskoe

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## General Comment

I strongly oppose the proposal. I am a concerned citizen that is alarmed by this arbitrary proposal to harm new immigrants and burden communities.

The proposal to prevent an asylum seeker from receiving a work permit would necessarily result in additional financial hardships for these immigrants. The inevitable consequence will be that they will seek assistance - whether from government, charitable organizations, religious institutions, or individuals - for basic necessities. It makes no sense to erect barriers that would prevent these new immigrants from supporting themselves. The proposal would also result in reduced tax revenues for local and state governments. There are only costs and no benefits to this proposal.

AR003274

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-501w
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1579

Comment Submitted by Teresa Generas

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## Submitter Information

**Name:** teresa generas

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## General Comment

Let's give these agencies enough time to properly vet these immigrants. I support President Trump in his efforts to keep our Country safe!

AR003275

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-gnqf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1580

Comment Submitted by Barry Williams

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## Submitter Information

**Name:** Barry Williams

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## General Comment

The timeline allowed by the Democrats is insufficient to allow for proper background check on immigrants. The safety of our nation should ALWAYS come first. President Trump is right ! A thorough check is a MUST !

AR003276

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-93yf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1581

Comment Submitted by Kent Fossum

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## Submitter Information

**Name:** KENT FOSSUM

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## General Comment

Please support POTUS for the immigration reforms that have been proposed.

AR003277

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-zk8s
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1582

Comment Submitted by Monica Nevin

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## Submitter Information

**Name:** Monica Nevin

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## General Comment

Asylum seekers need the ability to work as currently allowed so that they may financially support themselves and begin the process of healing that is needed following the trauma they suffered leading them to need to file asylum in the U.S., their legal right under International Law and the INA.

AR003278

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Tracking No.</b> 1k3-9d6o-rfk4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1583

Comment Submitted by Jeff Schoettle

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## Submitter Information

**Name:** Jeff Schoettle

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## General Comment

Please support President Trump's Immigration reforms. It is a critical need to protect the citizens of the United States.

AR003279

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-b0yy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1584

Comment Submitted by Jerry Dempsey

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## Submitter Information

**Name:** Jerry Dempsey

---

## General Comment

I urge you to support the president with his immigration reform bill.

AR003280

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-qg4n
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1585

Comment Submitted by Lynda Ray

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## Submitter Information

**Name:** lynda ray

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## General Comment

The first obligation of all of the federal government is to secure Americans. Don't cut corners with our safety.

AR003281



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-x51r
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1586

Comment Submitted by Laura Martin

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## Submitter Information

**Name:** Laura Martin

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## General Comment

Support President Trumps Immigration Reforms! There should be no time limit on vetting asylum seekers.

AR003282

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6n-bbbj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1587

Comment Submitted by Patsy Ross

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## Submitter Information

**Name:** Patsy Ross

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## General Comment

You need to follow the laws, just like the rest of us. Give them the 30 days required BY LAW!

AR003283

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-clcf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1588

Comment Submitted by Hans Hansen

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## Submitter Information

**Name:** Hans Hansen

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## General Comment

Please instead of pursuing a fake impeachment, take care of the illegal alien problem at our borders

AR003284

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-t02w
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1589

Comment Submitted by Pert Hora

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## Submitter Information

**Name:** Pert Hora

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## General Comment

Allowing the asylum seekers to work encourages them to follow the law. The locals do not take advantage of their labor. Taxes are paid and the seekers are not victims of fraudsters.

AR003285

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-soxd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1590

Comment Submitted by Shira Levine

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## Submitter Information

**Name:** Shira Levine

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## General Comment

The safety of US citizens including Legal immigrants is to be of primary concern.

AR003286

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-3eht
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1591

Comment Submitted by Zoila Gomez

---

## Submitter Information

**Name:** Zoila Gomez

**Address:**

84 East Haverhill St  
Lawrence, MA, 01841

**Email:** Zoila@gomezpalumbolaw.com

**Phone:** 9786831460

---

## General Comment

The change proposed by this rule will be devastating for families seeking asylum and waiting for a work permit to be able to support themselves and their families. these tactics to keep people oppressed are already hurting so many families in the US who can apply for a work permit in other categories and sometimes have to wait for an approval 6 to 8 months. This is the same thing that this regulation seeks to expand. This cant be good for the country, the economy or the immigrants trying to survive to make a decent living.

AR003287

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-wja7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1592

Comment Submitted by Janie Hammond

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## Submitter Information

**Name:** Janie Hammond

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## General Comment

I'm concerned about the broken immigration system and the efforts to sabotage policies and laws being attempted to fix it. Washington and Congress must support these efforts to secure the border. Many Americans have died and suffer because of unsecured borders and this must stop. By securing the border we can prevent hundreds of deaths and sexual assaults.

AR003288

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-a29p <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

## Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

## Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1593

Comment Submitted by Jennifer Williamson

## Submitter Information

**Name:** Jennifer Williamson

## General Comment

Asylum seekers deserve the right to survive in the US. Removing the 30-day delay would only put homeless families on the streets, lead to needless suffering and death among populations of people already victimized and traumatized, and undermine our reputation as a country concerned with human rights. All appropriate measures should be taken to help refugees and asylum seekers, including timely permission to earn a living, feed their families, keep a roof over their head, and survive.

AR003289



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-fjrq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1594

Comment Submitted by Jack Crunican

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## Submitter Information

**Name:** Jack Crunican

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## General Comment

Give the president adequate time to check each and every person coming into our country.

AR003290

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-q29t
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1595

Comment Submitted by Garry Stoklas

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## Submitter Information

**Name:** Garry Stoklas

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## General Comment

It is vital that our country gets control of it's borders and immigration. Please support President Trumps efforts to do so.

AR003291

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-ihd5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1596

Comment Submitted by John Carver

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## Submitter Information

**Name:** John Carver

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## General Comment

I wish our congressman would actually do something that is good for legal Americans. This is crazy to keep letting people come here plus now you don't want to take the time to weed out the bad ones. Please stop all this fullness and work with President Trump

AR003292

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-iyb5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1597

Comment Submitted by Pamela Papietro-Malone

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## Submitter Information

**Name:** Pamela Papietro-Malone

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## General Comment

Every person who wants to come here, needs to be fully checked, not just passed through. There are many who only want what is free for them. Many drugs and criminals are coming in! This needs to stop!

AR003293

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-vfr9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1598

Comment Submitted by Ruth Arnold

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## Submitter Information

**Name:** Ruth Arnold

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## General Comment

Do your job by supporting President Trump's immigration reforms!

AR003294

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6n-wje3 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> API
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1599

Comment Submitted by Jacob Frey, Mayor of Minneapolis

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## Submitter Information

**Name:** Jacob Frey

**Address:**

350 S. Fifth St. - Room 331

Minneapolis, MN, 55415

**Phone:** 612.673.2100

**Submitter's Representative:** Mayor Jacob Frey

**Government Agency Type:** Local

**Government Agency:** City of Minneapolis

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## General Comment

See attached file

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## Attachments

110719.30day deadline for asylum seekers letter MJF

AR003295

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue NW  
Mailstop #2140  
Washington, D.C. 20529-2140

DHS Docket No. USCIS-2018-0001  
84 F.R. 47148

November 7, 2019

To Whom It May Concern:

As the Mayor of the City of Minneapolis I am writing to submit this comment in strong opposition to the Department of Homeland Security's (DHS) Notice of Proposed Rulemaking on Removal of 30-Day Processing Provision for Asylum Applicant Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

The City of Minneapolis welcomes immigrant and refugee communities, including asylum seekers. Asylum seekers come to Minneapolis from all over the world and contribute to our communities, our economy, our schools, health care system, community organizations, and government. The City of Minneapolis is strongly committed to the safety, prosperity and strength of the asylum seekers in our city, as we know that they, as well as other immigrants and refugees, leads to increased strength and resiliency of our city.

The proposed rule change that I am commenting on would eliminate the 30-day processing time for asylum based applications for work authorization (EADs) which is currently contained at 8 C.F.R. 208.7 (a)(1). As a city within a state where many asylum applicants reside, we support the ability of asylum applicants to obtain employment authorization within as rapid a timeframe as possible. It is anticipated that elimination of the rule requiring that asylum based EADs be processed within a 30-day timeframe would lead to increased economic instability and decrease in housing security and physical safety of asylum seekers and their family members, thus creating greater challenges within a community already experiencing the harmful effects of persecution and threatened persecution.

In fact, gainful employment is often one of the first steps that assists asylum seekers who have experienced persecution in regaining a sense of self, identity and purpose separate from the lives they left behind in their home country. Access to a work authorization document increases stability in the US, by enabling asylum seekers to not only work, but also obtain a social security number and a state identity document or driver's license, thereby increasing the independence that asylum seekers and their families experience.

AR003296

While the Department of Homeland Security has provided an estimate of lost wages of \$255.88 million to \$774.76 million and employment tax losses to the federal government ranging from \$39.15 million to \$118.54 million, an assessment has not been made regarding the psychological impacts, health and other impacts that a potential additional 6-month delay in accessing an employment authorization document would likely impose upon the targeted population. Furthermore, an estimate has not been made regarding the state and local income tax losses that would result from implementation of this rule. Such costs are likely to be significant.

The latest figures released from the Chicago Asylum Office (the office with jurisdiction over asylum applications originating for residents of the state of Minnesota as well as other states in the upper midwestern region) indicate that as of January 24, 2019, 22,324 asylum applications were in process, and that slightly over 1300 cases had been adjudicated as of December 31, 2018. Another resource indicates that that same Chicago Asylum Office (coded ZCH), received 364 asylum applications within a three-month period, between October 1 and December 31, 2018.<sup>1</sup>

The current typical processing time for an employment authorization card (EAD) is over 180 days. When a regulatory change to processing of work authorization applications for other classes of EAD applicants went into effect on January 17, 2017 (eliminating the provision requiring USCIS to process EAD applications within 90 days of submission) the result was a doubling of processing times. There is little doubt that if the proposed rule were implemented, asylum-applicant based EAD applications would suffer the same fate, and would take 6 months or more to process.

It is critical for asylum seekers to have access to an employment authorization document as quickly as possible. Asylum seekers may not file their applications for work authorization until their asylum applications have been in process for 150 days, and do not qualify for a work authorization document until their applications for asylum have been in process for 180 days. If this rule were to go into effect, it would likely result in asylum seekers being required to wait a year or more after filing their applications to obtain a work card.

Many asylum seekers are members of particularly vulnerable populations, including single women with children and unaccompanied minors. Some are individuals whose earnings can provide financial support to family members who also had to flee the home country, but are living in conditions of instability in a third country. If EAD applications for this population are delayed as contemplated by this rule, this delay will have significant impacts on the City of Minneapolis, as more asylum seekers would likely require financial, housing, food, and other forms of assistance and support – support that the federal government would not provide while their applications are in process.

The explanations advanced by the Department for implementation of this rule simply do not justify imposition of a regulation which would have such serious effects on the target population and, frankly on the City of Minneapolis. With regard to concerns of fraud, asylum seekers submit to a biometrics appointment during the 150 day period after their asylum application has been filed, thus the government has an ample time to conduct background investigation before the EAD application is even filed for this population. Furthermore, DHS already has the ability to stop the clock on the 30-day processing timeframe if additional proof from the applicant in order to address fraud concerns is necessary.

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## Conclusion

This proposed rule is yet another attempt by this administration to create barriers for individuals who flee their home countries seeking safe haven in the United States from obtaining security in this country and become contributing members of our society.

For the reasons detailed above, in my capacity as Mayor of the City of Minneapolis, I ask the Department of Homeland Security to withdraw the proposed rule eliminating the 30-day processing time on asylum application based applications for employment authorization, and instead dedicate its efforts to processing all applications for immigration benefits within a reasonable timeframe.

Thank you for the opportunity to submit comments on this proposed rulemaking and I stand ready to provide additional supportive information should that be necessary or desired.

Sincerely,

A handwritten signature in black ink, reading "Jacob Frey". The signature is fluid and cursive, with the first name "Jacob" and last name "Frey" clearly legible.

Jacob Frey  
Mayor of Minneapolis

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-xece
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1600

Comment Submitted by Paul Toland

---

## Submitter Information

**Name:** Paul Toland

**Address:**

100 Cambridge Street

14th Floor

Boston, MA, 02114

**Email:** Paul@paultolandlaw.com

**Phone:** 7817608315

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## General Comment

Removing this rule would only cause more problems and not only affect asylum seekers but employers as well. Removing this rule provides no positive impact to society and the rule now promotes legal employment. Additionally, removing this rule would cause extreme financial hardship on families which in turn could cause them to work illegally and what is the point of that. Please use common sense and keep the rule and let these people work lawfully as they are contributing to society with lawful work authorization. People are going to work no matter what so we might as well provide lawful work authorization rather than create more headaches and problems for this country. We have other things to worry about than changing this rule.

AR003299

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-6wi2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1601

Comment Submitted by Warren Johnson

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## Submitter Information

**Name:** Warren Johnson

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## General Comment

Please be realistic about immigration. Surely you agree that undesirables are taking advantage of our pitiful immigration policies.

Please don't add to crime, terrorism, or MY tax burden. Many US citizens are already struggling

AR003300

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-lxxj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1602

Comment Submitted by Stephen Hammill

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## Submitter Information

**Name:** stephen hammill

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## General Comment

If they don't follow the laws they are illegals. Doing it en masse makes them an invading force.

The invasion must be stopped by any means necessary - ANY MEANS!

AR003301

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-irnf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1603

Comment Submitted by Robert Goodman

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## Submitter Information

**Name:** Robert Goodman

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## General Comment

Immigrants must be thoroughly background checked before letting them into this country. When I apply for a Visa I get thoroughly checked before I'm allowed to go to other country? Why not foreigners wanting to come into our country? This system is letting in foreign criminals and terrorist and must stop. We too shall soon have in our cities burned out buildings and rubble everywhere just like the places they have come from because this is how they function and live. Please stop this madness.

AR003302

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6l-qccv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1604

Comment Submitted by Diana Fridline

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## Submitter Information

**Name:** Diana Fridline

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## General Comment

Im asking you to help President Trump to secure Americas safety by removing this arbitrary, ridiculous timeline set in place by bureaucrats. This administration needs enough time to thoroughly check the background of every asylum seeker. The bureaucrats are forcing Trumps administration to cut corners and making America less safe.

AR003303

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-okzx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1605

Comment Submitted by John Kerkstra

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## Submitter Information

**Name:** John Kerkstra

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## General Comment

We need to stand together with President Trump and allow him to be in charge

AR003304

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-rdn4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1606

Comment Submitted by Priscilla Higuera

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## Submitter Information

**Name:** Priscilla Higuera

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## General Comment

Getting rid of the 30-day processing provision for (c)(8) category EADs would not only be a disservice to asylum seekers, but to the U.S. economy. The sooner an asylum seeker has employment authorization, the sooner that person is a productive, working, tax-paying member of society. The administration is so concerned with immigrants seeking public benefits, and an employment authorization document is the way asylum seekers achieve financial security.

AR003305



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-ijka
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1607

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Asylum seekers should be allowed to work while awaiting their hearings! So many immigrants fill jobs that very few native born Americans are willing to take. By allowing them to work, they are able to support themselves. Otherwise, it is easy for them to be forced into government programs. This is a senseless, shameless ploy to gain some perverse support from uneducated Americans. Every human being has the right to work and live in safety. When they aren't able to, then the real problems begin. This would only add further to unrest and possibly violence.

AR003306

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-t4vz <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1608

Comment Submitted by Jacque Houston

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## Submitter Information

**Name:** Jacque Houston

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## General Comment

For the sake of our national safety  
Remove the limitation you have put  
On investigation to determine if an illegal would be an asset to our  
country. This cannot be rushed. Remember, it is to protect our American citizens from harm

AR003307

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-d5xh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1609

Comment Submitted by Christopher Carroll

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## Submitter Information

**Name:** Christopher Carroll

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## General Comment

We need to make sure all immigrants have proper checks and background looked into before being aloud to enter the U.S.A.

AR003308

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-i8o0 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1610

Comment Submitted by Harold Lowry

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## Submitter Information

**Name:** HAROLD LOWRY

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## General Comment

ALLOW SUFFICIENT TIME TO PROPERLY VET ALL PERSONS TRYING TO ENTER MY COUNTRY. I CAME TO THE GREATEST COUNTRY IN THE WORLD THE LEGAL WAY. I'M PROUD TO BE AN AMERICAN.  
DO YOUR PART TO KEEP ME THAT WAY.

AR003309

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-13h6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1611

Comment Submitted by Anya McMurray

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## Submitter Information

**Name:** Anya McMurray

**Address:**

914 N Irving ST  
Arlington, VA, 22201

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## General Comment

To whom it may concern:

As a parent of elementary school age children in a district that has received a significant number of asylum seekers in recent years, I routinely come into contact with families seeking asylum.

The proposed rule would result in asylum seekers losing wages and benefits as a result of delayed entry into the U.S. labor force, straining not only their ability to support themselves and their families, but placing a greater burden on support systems in communities that are eager to support them - including our schools which welcome these children as our own. We are doing our part and we expect the federal government to help asylum seekers do theirs, not throw up additional and unnecessary obstacles.

Delays in work authorization will result in the inability to afford food, housing, health care, legal services and many other crucial supports that a paycheck allows one to secure. The resulting stress and instability impacts the whole family and by extension the whole community - including our schools and students.

Denying someone the opportunity to work and become self-supporting while their application is processed is counterproductive, having adverse impacts on the individual, their family and the broader community.

Please reconsider this policy change.

AR003310

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6n-f4gx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1612

Comment Submitted by Robert Freihaut

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## Submitter Information

**Name:** Robert Freihaut

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## General Comment

Please fix the immigration system the way the President has proposed.

AR003311

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-cjru
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1613

Comment Submitted by Suzanne Clark

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## Submitter Information

**Name:** Suzanne Clark

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## General Comment

Please support President Trump's efforts to properly vet asylum seekers. There needs to be adequate time to properly check backgrounds of these people. To not do so is to put the security of our country at great risk.

AR003312

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-liia
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1614

Comment Submitted by Sandra Hughes

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## Submitter Information

**Name:** Sandra Hughes

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## General Comment

Cut the stupidity start doing your jobs instead of the trubiticy you have been doing for 3 years let the Armenian people vote, in 2020 if they what Trump for president for another 5 years! You AZ re wasting tax payers money!!!!!!@

AR003313



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-4x4r <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1615

Comment Submitted by Rosa Waters

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## Submitter Information

**Name:** Rosa Waters

**Address:**

1576 S 800 E

Salt Lake City, UT, 84105

**Email:** rosa.m.waters@gmail.com

**Phone:** 8045438999

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## General Comment

As someone who works with asylum seekers daily, I know that my clients are already struggling as-is with the six-month wait period for apply for work permits.

Imagine if you were suddenly forced to leave everything you know, using all of your savings to pick up and flee your country. On top of dealing with this sudden change, you are also still recovering--perhaps physically and emotionally--from whatever violence forced you to leave. Maybe you have a family that came with you, young children. They need to eat. Getting to the U.S. was expensive, and on top of that, you now need to hire an attorney and survive as your asylum application is filed and you wait out the six-month period. People want to follow rules, but if you extend the wait time to one year, more and more people will start working without work permits out of desperation. When working under the table, these individuals' are likely to be exploited and out of fear, they likely won't file income taxes. The already drawn-out and stressful process of applying for asylum, which is seemingly ever-changing, will become even more stressful for these individuals. These people have already been through the worst of the worst; I see the scars every day. Don't make it any harder than it already is for them.

AR003314

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-7czw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1616

Comment Submitted by C Gar

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## Submitter Information

**Name:** C Gar

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## General Comment

Employment authorization is a must for asylum immigrants. These individual need to be self sufficient and self supporting in order for them to start the cultural and economic assimilation. Additionally, taking the right to work away will only prolong their dependence from the U.S government.

AR003315

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6r-gtnj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1617

Comment Submitted by James Johnson

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## Submitter Information

**Name:** James Johnson

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## General Comment

Please support President Trump's immigration policies and allow proper time to vett all applicants.

AR003316

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-511c
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1618

Comment Submitted by Patricia Howland

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## Submitter Information

**Name:** Patricia Howland

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## General Comment

Please support President Trump in all his efforts to protect and enrich our country.

AR003317

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-jwb8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1619

Comment Submitted by Gerald Petras

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## Submitter Information

**Name:** Gerald Petras

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## General Comment

Please stop anchor babies and a time limit to vent for entry into the United States.

AR003318

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-yius <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1620

Comment Submitted by Thomas Sartain

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## Submitter Information

**Name:** Thomas Sartain

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## General Comment

Keep the USA Safe. Support President Trump or ELSE!

AR003319

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-sna4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1621

Comment Submitted by RJ Thomas

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## Submitter Information

**Name:** RJ Thomas

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## General Comment

Please help to keep our borders safe. There should not be such a ridiculously limited timeline to process every asylum seeker. We must keep our country, and therefore our citizens, safe by thoroughly examining the background and reason for asylum of each and every seeker. Our national security depends on it.

AR003320

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-21f8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1622

Comment Submitted by David Brown

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## Submitter Information

**Name:** David Brown

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## General Comment

We have had several family members who have become citizens the legal way. It is a long and laborious process. Please improve the process but take you time to make changes so that the changes are the right thing to do for the security of our country.  
Thank you.

AR003321



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-ddmf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1623

Comment Submitted by Sally Shook

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## Submitter Information

**Name:** Sally Shook

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## General Comment

Pls support r great President on these very important immigration reforms. Our country is depending on you!

AR003322

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-9eli
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1624

Comment Submitted by Pawiter Parhar

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## Submitter Information

**Name:** Pawiter Parhar

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## General Comment

Please give amnesty to those kids and their parents who they are inside the cage like prisoners.  
Please let them free they can start work and go to their schools.

AR003323

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-4q19 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1625

Comment Submitted by Jerry Irwin

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## Submitter Information

**Name:** Jerry Irwin

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## General Comment

Please Support President Trumps immigration Reforms! !!!!!!!!!!! We ordinary workers are taking a back seat toward job wage growth, because of all the immigrants. They are also DRAINING OUR SOCIAL SECURITY SYSTEM!!!!!!!!!!!!

AR003324

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-rjwl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1626

Comment Submitted by Garry Mortensen

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## Submitter Information

**Name:** Garry Mortensen

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## General Comment

Please remove the timeline that is restricting the President and those who are trying to secure our safety. Your constituents are watching and can help vote you out as fast as they voted you in so PLEASE do the right thing and remove the ridiculous timeline.

AR003325

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-6rve
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1627

Comment Submitted by Jim Wilson

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## Submitter Information

**Name:** Jim Wilson

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## General Comment

Support President Trump's immigration reforms. Stop the political BS and join together to fix this problem. Focus on our medical insurance problem, trade issues, military and social security programs. !make America Great Again.

AR003326

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6o-lh9q <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1628

Comment Submitted by Cheryle Beaufait

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## Submitter Information

**Name:** Cheryle Beaufait

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## General Comment

With the enormous amount of illegal aliens seeking asylum, it is INSANE to restrict the vetting process. I'm beyond tired of Congress putting illegals before the safety of our great LEGAL CITIZENS.

AR003327

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-l52x
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1629

Comment Submitted by Leslie Creedy

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## Submitter Information

**Name:** Leslie Creedy

**Address:**

3 vernon street  
Newton, 02458

**Email:** leslie@lesliecreedy.com

**Phone:** 6177205855

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## General Comment

I understand that DHS is planning to eliminate the regulatory provision stating that USCIS has 30 days from the date an asylum applicant files the initial EAD application to grant or deny the initial I-765. The proposal to delete the 30-day processing time will be devastating for our asylum seeking clients who will be unable to work. Why would you not want people new to this country to work toward being self-sufficient. With all the backlogs in adjudicating EAD cases, this is one place where it is important to act as quickly as possible to ensure that these traumatized people can work and feel welcomed by this great country of ours.

DHS Docket No. USCIS-2018-0001

AR003328

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-en81
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1630

Comment Submitted by George Umerow

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## Submitter Information

**Name:** George Umerow

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## General Comment

AS a legal naturalized immigrant I personally take exception to anyone coming in illegally. I support President Trump's position fully. God Bless America!!

AR003329



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-xzet <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1631

Comment Submitted by Judith Hall

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## Submitter Information

**Name:** Judith Hall

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## General Comment

We want President Trumps immigration reforms to be supported.

AR003330

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-17lg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1632

Comment Submitted by Linda Scheibelhut

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## Submitter Information

**Name:** Linda Scheibelhut

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## General Comment

Please support our PRESIDENT'S plan to properly and thoroughly vet the illegals before allowing them to roam freely in our country. Stop and think of OUR citizen's safety, above YOUR egos!

AR003331

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-albq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1633

Comment Submitted by Michel Melillo

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## Submitter Information

**Name:** Michel Melillo

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## General Comment

Reforms proposed are necessary to protect National Security requirement that employment authorization process must be completed within 30 days makes it impossible to do satisfactory review

AR003332

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-g2v3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1634

Comment Submitted by Geila Phillips

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## Submitter Information

**Name:** Geila Phillips

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## General Comment

Please allow proper vetting for anyone entering into our country. We the American people deserve it. You wouldn't allow everyone that knocked on your front door (oh, I forgot, y'all live in gated communities, so proper vetting is enforced) in just because they knocked, Americans deserve it as well.

AR003333

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1635

Comment Submitted by Cori Hash

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## Submitter Information

**Name:** Cori Hash

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## General Comment

As an attorney who has worked with asylum seekers for nearly 15 years, I have seen how important it is for asylum seekers to have authorization to work to be able to support themselves and their families as they await a decision on their asylum case. Asylum seekers must already wait a minimum of six months from the time they apply for asylum until they are even eligible to apply for and receive work authorization. The 30-day processing rule is needed to ensure that asylum seekers receive their employment authorization document promptly and can begin to work.

If the 30-day processing rule is eliminated, asylum seekers will be faced with a six month wait just to apply plus six to eight months to await the processing of the I-765 and the arrival of the EAD (based on current processing times). This would mean that asylum applicants would be faced with a minimum of a year wait to be eligible to work in the U.S. based on current processing times. That is a significant amount of time to not have the means to work to support oneself. Asylum applicants are not eligible for any government benefits while their case is pending; they need to receive authorization to work as quickly as possible and even a few months makes a difference.

AR003334

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1636

Comment Submitted by Pamela Cook

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## Submitter Information

**Name:** Pamela Cook

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## General Comment

Please I beg you to put politics aside and protect us from the types of senseless murders of this week from Mexican cartel thugs. We beg you! What if this was your family???

AR003335

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1637

Comment Submitted by Jamie Sorensen

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## Submitter Information

**Name:** Jamie Sorensen

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## General Comment

These are dangerous people coming across our borders. How many more good Americans have to die before we stop this crap? SECURE THE BORDERS NOW.

AR003336

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-hf1k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1638

Comment Submitted by Nancy Van Apeldoorn

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## Submitter Information

**Name:** Nancy Van Apeldoorn

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## General Comment

Please keep the illegal crooks out of America. My 84 yr old Aunt was robbed and raped by a 24 yr old illegal. She passed a few months after going thru all the court hearings.  
We should be safe!!!

AR003337



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1639

Comment Submitted by Shirley Harper

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## Submitter Information

**Name:** Shirley Harper

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## General Comment

This madness has to stop. We want our country safe and everyone that comes in to do so legally and to be thoroughly checked out, even though it takes a bit longer than liberals are willing to accept!!!!  
Keep US safe and deport all ILLEGALLY here!

AR003338

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-njrm
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1640

Comment Submitted by Eliane Kuo

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## Submitter Information

**Name:** Eliane Kuo

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## General Comment

Please secure the border. We need to know who is entering our country. Other countries do that too . When we visit their country they want to know the purpose I am there and how long do I stay. I also need a visa. We are not able just to walk in.

AR003339

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-rker
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1641

Comment Submitted by James Sorta

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## Submitter Information

**Name:** JAMES SORTA

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## General Comment

KEEP AMERICA SAFE

AR003340

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6l-c6of
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1642

Comment Submitted by Charles Morton

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## Submitter Information

**Name:** Charles Morton

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## General Comment

Turn away immigrants at the border! Do not let them get into the US until they have been vetted! Once they are in the country, it is very hard to keep track of them! Detention Centers are not the answer!

AR003341

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6n-87ui
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1643

Comment Submitted by Kerri Babish

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## Submitter Information

**Name:** Kerri Babish

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## General Comment

The removal of the 30 day processing provision for asylum applicants is both inhumane, and does unnecessary economic harm to both asylum seekers and to communities. This provision allows asylum applicants to be a part of building our economy, removing it forces them to become a drain on community resources. Work is also an important source of personal pride for those going through the destabilizing experience of seeking asylum

AR003342

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1644

Comment Submitted by Marti Jones

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## Submitter Information

**Name:** Marti Jones

**Address:**

1121 E Loch Lomond  
Salt Lake City, UT, 84117

**Email:** mlj@burgoyne.com

**Phone:** 309 808 1491

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## General Comment

The proposed regulatory change is fundamentally counter productive at multiple levels. Even the U.S. government admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security. The proposed change will further punish asylum seekers, creating additional barriers to self reliance and forcing them into potentially abusive dependence on U.S. sponsors.

The government does not need the additional time, and the claims of negative impact on national security are overstated.

USCIS has been able to decide over 99% of EADs within the 30-day timeframe for over the past year. Moreover, the agency's argument regarding increased threats serves only to prompt the need for a speedier process to properly protect national security, rather than it's proposal to further delay the vetting process. Where vetting is critical to national security, delaying that process seems contrary to the departments stated goals.

This proposed rule change is yet another aspect of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. By delaying by more than a year (based on current USCIS adjudication time frames for I-765's combined with the statutory 180 day waiting period) the ability of asylum seekers to gain meaningful employment, the Administration effectively turns asylum seekers into public charges.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to

**AR003343**

work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCIS's goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

Finally, USCIS admits that proposed regulatory change will result in lost compensation to asylum applicants of between \$255.88 million and \$774.76 million per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks.

AR003344

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6l-lq74
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1645

Comment Submitted by Sydney Schaedel

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## Submitter Information

**Name:** Sydney Schaedel

**Address:**

4111 Walker Ave  
Greensboro, NC, 27407

**Email:** sydschaedel@gmail.com

**Phone:** 7037987925

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## General Comment

Asylum seekers are legally seeking safety in the United States. Because our court systems cannot process their applications instantaneously (and nor should they, because asylum applicants deserve due process), these legal asylum applicants must work to support themselves while they wait, just like the rest of us. They deserve expeditious adjudication of their applications for employment authorization. Depriving employment authorization will result in more people working without authorization, who are then more vulnerable to exploitation and labor trafficking. I urge you to continue to process employment authorization applications for asylum seekers within 30 days to preserve their safety and dignity.

AR003345



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1646

Comment Submitted by Rick Pratt

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## Submitter Information

**Name:** Rick Pratt

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## General Comment

Please eliminate the 30 day screening rule which forces the process to be rushed. We need to take our time to be thorough

AR003346

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-tgpt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1647

Comment Submitted by Karen Schmidt

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## Submitter Information

**Name:** Karen Schmidt

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## General Comment

Help President Trump secure Americans safety. Remove the timeline!

AR003347

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1648

Comment Submitted by Emily Scotton

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## Submitter Information

**Name:** Emily Scotton

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## General Comment

My name is Emily Scotton, and I am an attorney in North Carolina. I oppose the removal of the 30 day processing provision for asylum applicants. This proposed change will result in a loss of tax revenue. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security. Furthermore, as the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day time frame in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR003348

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<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-4vki <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1649

Comment Submitted by Patricia Hyden

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## Submitter Information

**Name:** Patricia Hyden

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## General Comment

Speed up immigration process our president requested.

AR003349

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1650

Comment Submitted by Anne Schaufele

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## Submitter Information

**Name:** Anne Schaufele

**Address:**

4300 Nebraska Ave NW

Suite Y265

Washington, DC, 20016

**Email:** aschauf@wcl.american.edu

**Phone:** 2022744484

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## General Comment

My name is Anne Schaufele. I am an immigration attorney and Clinical law instructor in a clinic that represents asylum-seekers from all over the world. I write in strong support of preserving and protecting the 30-day timeframe for USCIS to adjudicate work permits for asylum-seekers, who already have to wait 150 days before they're even eligible to apply for work authorization. I have represented asylum-seekers who are world-renowned journalists, doctors, lawyers, police officers, and other highly trained professionals, as well as hard-working construction workers and restaurant staff (including an asylum-seeker employed at a Trump hotel), who all serve our country tremendously. They are all fleeing countries where they would be killed, and we benefit when they can rebuild their lives here. Most of my clients count down the days until they receive a work permit and can start contributing to this country. USCIS has significant delays in processing nearly all of the applications before them. If the government removes this 30-day requirement, it is no exaggeration that we could have asylum-seekers waiting for months to several years before their work permits are adjudicated. I urge you to consider the harm to asylum-seekers who could end up on the street instead of treating you as their patient, or constructing your next office building, and the harm to the government of losing out on tax revenue and skilled work. Thank you for your time.

AR003350

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1651

Comment Submitted by Ruben Rodrigues

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## Submitter Information

**Name:** Ruben Rodrigues

**Address:**

111 Huntington Ave  
Foley & Lardner LLP  
Boston, MA, 02130

**Email:** rrodrigues@foley.com

**Phone:** 617-502-3228

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## General Comment

DHS Docket No. USCIS-2018-0001

I am providing a comment AGAINST the proposed rule change. I have assisted many applicants with legitimate claims for asylum over the years (who have been granted asylum) and I cannot fathom the horrible effects that the proposed rule change would have had on their situations. The rule change would allow work authorization request to languish without being acted on while preventing asylees from contributing to the economy by engaging in work. The proposed change would also lead to many, if not all, asylee applicants seeking some form of public assistance--which is not in line with the current administrations goals. The current rule change apparently would also have a negative effect on currently working applicants whose renewals may be affected--forcing them out of currently productive work. I strongly OPPOSE this rule change.

AR003351

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-g9a9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1652

Comment Submitted by Gary Benoit

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## Submitter Information

**Name:** Gary Benoit

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## General Comment

Here in southern Arizona we have been inundated by waves of illegal aliens for years. President Trump has the right idea of how to revise and amend immigration laws to clear up many of the problems. He deserves your support. When have been told that immigrants undergo a "rigorous" background check, but regrettably this is not the case. Give immigration officials enough time to perform their tasks properly rather than assigning an arbitrary deadline for their completion.

AR003352

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1653

Comment Submitted by Barbara Holmes

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## Submitter Information

**Name:** Barbara Holmes

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## General Comment

Please support President Trumps efforts to control our borders and limit as many illegal immigrants as possible. That includes passing laws that require states and municipalities to cooperate with Federal Immigration Laws, not putting an unreasonable time line for vetting refugees or people seeking green cards. We are still a sovereign country. Help keep us that way.

Barbara

AR003353



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1654

Comment Submitted by Madeline Erwin

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## Submitter Information

**Name:** Madeline Erwin

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## General Comment

Dear unrepresentatives,

It is time to start enforcing laws on the books. The House wants to hold President Trump accountable for his past life and they are not working for us, the American public. Close our borders and go back to letting in the people that want to live here lawfully. Instead of chaos, let's get back to work on immigration reform. We want Legal people in America.

AR003354

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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1655

Comment Submitted by Deborah-Lynn Senger

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## Submitter Information

**Name:** Deborah-Lynn Senger

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## General Comment

Good people apply to enter our USA LEGALLY every day, as they have for Centuries! It's d ad wrong to allow People to "Cut in Line" by hundreds of thousands without proving they have good things & skills to benefit our Nation!

Give our borders the security & safety we need and keep immigration reasonable & sensible for a growing economy! Let President Trump continue his plans! Citizens agree, we need more Common Sense & less liberal NonSense!

AR003355

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1656

Comment Submitted by Conor Gleason

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## Submitter Information

**Name:** Conor Gleason

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## General Comment

There is no good reason to keep asylum seekers from employment. Immigrants benefit our country and our economy. The Trump Administration's desire to limit asylum seekers' access to work permits is simply another example of the administration's xenophobia and racism.

AR003356

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-nofq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1657

Comment Submitted by Sophia Gurul

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## Submitter Information

**Name:** Sophia Gurul

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## General Comment

What is wrong with you? Let people work to survive and thrive. I support immigrants and communities, not this proposed regulation, not this president, not the people who work for this president, and not one single person who uses phrases like "stop illegals".

AR003357

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-j4wt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1658

Comment Submitted by Becky Cafasso

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## Submitter Information

**Name:** Becky Cafasso

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## General Comment

Please support President Trump immigration reforms . Stop the Democrats ridiculous impeachment hoax! When will they stop blocking everything he tries to do for our country?

AR003358

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-sxmt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1659

Comment Submitted by Jeff Schoettle

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## Submitter Information

**Name:** Jeff Schoettle

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## General Comment

Please support President Trump's Immigration Reforms and protect the citizens of the U.S.

Thank you.

AR003359

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-921a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1660

Comment Submitted by David Barnes

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## Submitter Information

**Name:** David Barnes

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## General Comment

Support Trump on immigration reform. It's imperative in order to keep this country safe from criminals.

AR003360

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-1nx1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1661

Comment Submitted by Sherry Norquist

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## Submitter Information

**Name:** Sherry norquist

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## General Comment

Support Trumps immigration reform !! Stop the dam illegals from coming in we owe them NOTHING!!! Unreal

AR003361



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-cx4s <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1662

Comment Submitted by Donald Schima

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## Submitter Information

**Name:** DONALD SCHIMA

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## General Comment

THERE SHOULD NOT BE A TIME LIMIT -M ONLY THE NORMAL TIME PERIOD TO THOROUGHLY CLEAN BACKGROUNDS.

AR003362

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-6w9p <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1663

Comment Submitted by Paul Woyciechowski

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## Submitter Information

**Name:** Paul Woyciechowski

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## General Comment

We need Washington to Support President Trump's Immigration Reforms!

AR003363

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-mctz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1664

Comment Submitted by Johnki Kiger

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## Submitter Information

**Name:** johnki Kiger

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## General Comment

SPEND SOME OF MY STOLEN SOCIAL SECURITY MONEY YOUR WASTING ON AN  
IMPEACHMENT SHAM AND PROTECT MY BORDERS. YOU WORK FOR ME! STOP PUSHING  
SOCIALIST INSANITY WITH MY MONEY ITSJUST DANGEROUS!

AR003364

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6o-py2d <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1665

Comment Submitted by John Samuel

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## Submitter Information

**Name:** John Samuel

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## General Comment

Any illegal caught, who is not wanted for some other crime, should be forced to walk across the border, into Mexico or Canada, at gun point if necessary, no court date, no court hearing, no lawyers. Tell them to make application at a US Embassy or US Consulate. They do not get back into the US without a valid US Passport or a valid US Visa.

AR003365

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-naag
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1666

Comment Submitted by Catherine Gnatek

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## Submitter Information

**Name:** Catherine Gnatek

**Address:**

988 Fairmount Ave

Saint Paul, 55105

**Email:** cathygnatek@me.com

**Phone:** 6123817640

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## General Comment

I am a volunteer lawyer representing asylum seekers who have fled their home country because they were persecuted. I am honored to represent my clients. I wish I could share their stories here. There is not enough space. They are brave people who were good citizens in their home countries, but were raped, beaten and threatened simply of who they were or because they stood up against corruption in their own government. Every time I take a new case and hear the stories of the persecution my client has experienced at the hands of his/her government, I cry. I have to cry, it is the only way I can release all the sadness and go on to fight on their behalf. The trauma my clients have suffered leaves them with mental and often physical scars. I know from working with my clients that getting a job provides them with more than just money to live. It provides them with a sense of purpose that helps them get through the days. Without a job, someone who has experienced trauma can end up isolated and alone, it makes it that much more difficult to bear the interminable wait that clients seeking asylum must face as a result of our current system. There is no reason to deny work permits to asylum seekers right now. Every statistic turns to the reality that the U.S. needs more not fewer workers. Moreover, asylum seekers often take jobs that remain unfilled by U.S. citizens, lower paying jobs that are not desirable. It is disingenuous for the current administration to argue that delaying work permits will benefit U.S. workers. I urge the USCIS to not adopt the proposed rule. If it is adopted, it would take away the requirement that work permits be issued in 30 days and open a window for the possibility that work permits be denied indefinitely. Leaving asylum seekers without a path to legal employment is cruel, unnecessary and un-American.

AR003366

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-nu72 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1667

Comment Submitted by Esther Peach

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## Submitter Information

**Name:** Esther Peach

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## General Comment

Please back our President to keep our country safe

AR003367

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-n3cx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1668

Comment Submitted by Pamela Stout

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## Submitter Information

**Name:** Pamela Stout

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## General Comment

Please support the measures put forth by President Trump to allow thorough vetting of those who want to come to the US. My family followed the rules when we came in 1954. All should have the ability to take care of themselves and not be a burden to our society.

AR003368

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-qsk5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1669

Comment Submitted by LaVell Miller

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## Submitter Information

**Name:** LaVell Miller

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## General Comment

Please do not hold our President captive to a 30 day requirement to do a thorough security check on people asking for permission to come to the USA for immigration services. This time frame is unrealistic and will allow problem immigrants to sneak into our country and cause potential havoc.

AR003369



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-hmb4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1670

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Please do not pass this rule. We know that immigrants do a lot of labour in our country -- not allowing them to work will mean they can't support themselves and will only make them more dependent on the US government, instead of having them pay taxes and add to the economy. Removing this 30 day cap means these applications will pile up and we'll be missing out on tax dollars and forcing people to be dependent on other tax payers.

AR003370

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6o-8so6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1671

Comment Submitted by Colleen Lawson

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## Submitter Information

**Name:** Colleen Lawson

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## General Comment

Build the border wall. Fight terrorism and cartels.

AR003371

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-yx68
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1672

Comment Submitted by Raymond McDowell

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## Submitter Information

**Name:** Raymond McDowell

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## General Comment

Let our PRESIDENT DO HIS JOB  
AS HE SEES FIT.

AR003372

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6n-wkla <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1673

Comment Submitted by Sheila O'Keefe

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## Submitter Information

**Name:** Sheila O'Keefe

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## General Comment

Support OUR President Trump's immigration reform and close OUR borders NOW to illegal and criminal aliens. If they want to come here they can file an application at the American Embassy in their home country and PROVE they have the skills to be gainfully employed before they are allowed to enter OUR country!!!!!!

AR003373

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-ja0f
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1674

Comment Submitted by Lisa Hawks

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## Submitter Information

**Name:** Lisa Hawks

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## General Comment

the United States needs a wall to keep criminal illegal aliens out of our country. They are committing crimes against our US citizens and they are being let off by sanctuary cities, counties, and states and committing more crimes when let out...SECURE OUR BORDER NOW!!!

AR003374

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-kyhc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1675

Comment Submitted by Robert Carter

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## Submitter Information

**Name:** Robert Carter

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## General Comment

I plead to the Congress to please work with President Thump to ease the restrictions and let him do his job. I am sure that as Americans you are dedicated to preserving our country and will do the right thing.

AR003375

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-mcoj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1676

Comment Submitted by Terry Largent

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## Submitter Information

**Name:** Terry Largent

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## General Comment

Please consider allowing more time to vet our illegal immigrant asylum seekers. It endangers our country to have to rush through that process.

AR003376

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-68rl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1677

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

AR003377



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-f6qr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1678

Comment Submitted by Joan Hodges-Wu, Asylum Seeker Assistance Project

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## Submitter Information

**Name:** Anonymous Anonymous

**Organization:** The Asylum Seeker Assistance Project (ASAP)

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## General Comment

See attached file(s)

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## Attachments

Aylum Seeker Assistance Project (ASAP) Comment on the Proposed Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

AR003378

***“For most asylum seekers, the ability to work is a necessary life line.”***

Joan Hodges-Wu, Executive Director, Asylum Seeker Assistance Project (ASAP)

The latest announced rulemaking from the Trump Administration attempts to undo a 2018 federal court decision that mandates that U.S. Citizenship and Immigration Services determine an asylum seeker’s request for permission to work within 30 days. The proposed rule removes any processing deadline whatsoever. Asylum seekers already have to wait 150 days after they submit their asylum application to apply for work authorization.

**Asylum seekers need to work for their own survival.** Although 44 countries accept asylum seekers, the United States is the only country that denies asylum seekers access to services to meet their basic needs and simultaneously delays permission to work for an extended length of time. Obtaining work authorization has no effect on the legality of an asylum seeker’s legal case. Instead, it increases one’s ability to become economically self-sufficient while their asylum claim is being decided. Without the ability to support themselves, asylum seekers are more likely to become a burden on safety net services subsidized by the U.S. taxpayer, like homeless shelters and hospital emergency rooms.

**Our country needs asylum seekers as workers.** Seeking asylum is not a reflection of professional status. Asylum seekers include doctors, lawyers, teachers, and scientists as well as individuals who go on to work as home health aides, nannies, and food service workers. Every worker is important and our country needs them all.

**The proposed rule would negatively impact our country’s economy.** According to the government’s own figures, the proposed rule would cost our economy between \$225 - \$775 million dollars annually. Indefinite processing times would create chaos for thousands of employers and asylum-seeking employees. Lost employee wages would result in reduced tax revenue. The delay and/ or outright denial of work authorization adversely affects American business just as it harms asylum seekers. The proposed rule appears to be an effort to discourage people from seeking asylum without regard to the legitimacy of their claim. Asylum seekers include many in dire, life-threatening circumstances, who have no choice but to abruptly flee their countries.

**Denying them the ability to work and support themselves effectively shuts the door on such people, despite our nation’s long-standing commitment to international standards concerning the rights of refugees.**

Ultimately, ASAP as an organization can speak as much as we’d like to regarding the impacts of this proposal on asylum seekers, but we are nothing without our clients. Our clients are a vital part, not only of our community, but the DC Metro Area and the United States as a whole, and yet their voices are often absent from the table of discussion for the very regulations affecting every aspect of their lives. As such, we are concluding our comment with the voices that matter the most in this debate: the voices of asylum seekers.\*

**“As an asylum seeker in this country, my children and I have experienced firsthand the downside of unnecessary bureaucracy with which USCIS handles asylum applications. Asylum seekers are already burdened by an inhumane rule that bars us from applying for work**

**authorization the same time we apply for asylum.** The current rule does not allow us permission to apply for EAD until 150 days after our application have been sitting in the system. After we apply, it takes about another 150 days to receive the work authorization and start looking for work. Why does USCIS want to remove a rule that compels them to issue work authorization? This proposal, if implemented, will hurt families. While I waited to get authorization to work, I could not pay my rent on time and faced eviction from my apartment several times. I could not afford good meals for my family. My daughters could not get healthcare. Why do we have to be treated like criminals simply because we are running for safety? **We do not have to be treated less than humans only because we are seeking asylum.**" – Clarys

"After I arrived in America, I applied for asylum immediately. I learned that I should wait for 150 days, which was shocking news because I was staying in my friend's house and dependent on them for food, housing and transportation. After I applied for my EAD, I was told I should wait 2 to 4 months. I can say I was lucky I received it in two months; there are others who have waited more than that. The process was a total of seven months, and then applying for my SSN, which took three weeks to receive. In total, eight months, just to be ready to look for a job. **Anyone can imagine how miserable I was that long time without work, purpose, any support system.** I was crushed and felt sick, but wasn't able to see a doctor because I had no insurance or anyone who can support me to see a doctor. I was staying outside 7 days a week from 8:00 AM to 7:00 PM because I felt that I disturbed my friend's private family life, and I couldn't rent an apartment without income.

The delay of the work authorization process kills the asylum applicant's hopes to be safe. **A life without any income is a risk for an unhealthy lifestyle, malnutrition, emotional distress which leads to a critical health issue including suicidal thoughts.**" – Liya

"I am a person who entered legally to the United States, and I am at high risk to get affected by the long delay of processing EAD application. I applied for my EAD in March of 2019, and now it is November and I still didn't receive my EAD. Waiting for an EAD carries with it a tremendous amount of uncertainty and risk that could affect the people who worked hard to enter the States with legal status. I am currently waiting for my EAD, and using my savings to pay for rent and other basic necessities. It is a tunnel that doesn't seem to have a light at the end. Total limbo. It feels that I am rejected not only by my home country, but also the US.

These kinds of laws will also drive away many talents who would be extremely instrumental in the development of the American industry. **Many migrants and refugees who came here long ago became significant people that made a positive difference. This law will isolate people and will push out the potential minds that would benefit America and the World.** Before deciding on the proposed law that would delay processing times even further, I invite the USCIS and DHS to not only read this, but also have face-to-face conversations with those affected waiting for the EAD. I invite the director of DHS and USCIS, and other decision-makers to go down to the field where many community-based organizations and salt-of-the-earth people can show them the actual picture.

Regarding the future, I have no idea what it looks like. I am living day-by-day and volunteering with organizations to gain more skills. It is about never giving up, never staying down.



Regardless this hardship, you will find people who can deliver your voice. It is about keeping your voice high.” – Amir

**“One of the most difficult part of asylum-seeking process in the U.S. is waiting for an employment authorization document (EAD).** When our family was waiting 150 days to apply for EAD, we felt so much anxiety. At the beginning, we spent our savings we had brought from our home country. But later, the savings were over and our family got into a real trouble. We had no idea how to feed themselves and how to pay our rent. We survived only because some good friends and organizations were around: our friends brought some clothes, the organizations provided some food assistance and moral support, a landlord decreased our rent a little and agreed to wait for rental payment as long as needed. We felt terrible, because we had never been in such a difficult financial situation before. It affected our physical and mental health a lot. When 150 days passed since the date of our asylum application, we applied for EAD right away. We got the notice receipt from USCIS 3 weeks later and now finally waiting for EAD. In fact, turns out it takes about 1.5 - 2 months in total to get the first EAD, not 30 days: 3 weeks waiting for the notice receipt and 1 month waiting for EAD. We understand that USCIS works in stress and probably short-staffed, but when you have no money at all, every extra day of waiting is painful.

If the President’s administration decides to undo the 30-day mandate (which, like I said, in reality is not always 30 days) it will be a total disaster for people like us. **Having a 30-day term is something that gives us a lot of hope.** I am a university graduate with a lot of skills and professional background / job experience. The impossibility of having a job here doesn't make any good for me, but more importantly, it doesn't make any good for society. If the proposed rule is supposed to be an effort to discourage people from seeking asylum in the U.S., it is very inhumane. Those people who flee their home countries, leave their houses, in most cases without a chance to see their relatives again, have escaped life-threatening situations. So did my family. For me personally, cancellation of the 30-day waiting period for EAD means loss of hope, depression, and poverty, but definitely not a reason to return to my home country” – Tatyana

\*Client statements been edited for length and names have been changed to protect the identities of clients.

*The Asylum Seeker Assistance Project is a registered 501(c)3 non-profit organization. Contributions are tax deductible to the fullest extent permitted by law. No goods or services were received for this donation.*

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-upcv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1679

Comment Submitted by Phillip Frazier

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## Submitter Information

**Name:** Phillip Frazier

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## General Comment

Yes my name is Phillip Frazer I'm asking you to help support Donald Trump to keep our our freedom safe and and get rid of this bureaucracy that is going on in our nation because of illegal immigrants and they're trying to force things honest that don't need to be in our president and our fighting against it please support our president and be behind him 100%

AR003382

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-th0b <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1680

Comment Submitted by Gary Seith

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## Submitter Information

**Name:** GARY SEITH

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## General Comment

Please increase time to check asylum seekers to 6 months.

AR003383

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-bcfr <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1681

Comment Submitted by Randy Carter

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## Submitter Information

**Name:** Randy Carter

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## General Comment

Evict illegal aliens.

Vet asylum seekers.

Build the wall.

Support President Trumps immigration refors.

AR003384

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-90oy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1682

Comment Submitted by Denise Ziegler

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## Submitter Information

**Name:** Denise Ziegler

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## General Comment

I stand with President Trump

AR003385



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-2lm8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1683

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

By implementing this policy , there is loss for the government:

- 1: asylum seeker will get any under the table job by any means so they will not pay any tax (government loss)
2. When Asylum seeker is jobless and desperately needs a job it leads to crime and mess in the society (government loss)

AR003386

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-i2nt <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1684

Comment Submitted by William Young

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## Submitter Information

**Name:** William Young

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## General Comment

Setting artificial timelines to fix a broken program is just wreckless.

AR003387

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-zebf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1685

Comment Submitted by Gunda Brost

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## Submitter Information

**Name:** Gunda Brost

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## General Comment

Immigrants under this administration are damned if they do and damned if they don't. We accuse them of working illegally when they try to survive without recourse to legal options for working lawfully, then close down on their abilities to seek legal venues to work in a timely manner. These types of regulations make one thing clear: you better be independently wealthy if you want to immigrate here. Which completely flies in the face of our nation's great history. As someone who works with immigrants on a daily basis let me remind you: those who had to work hard to get here, those who have had real struggles to overcome are the ones that will work the hardest and become the best and most productive citizens.

AR003388

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-dvh0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1686

Comment Submitted by Michael Martin

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## Submitter Information

**Name:** Michael Martin

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## General Comment

I support President Trump policy 100%. This country does not need illegal violent aliens in our mist. They must be vented and sent back if necessary

AR003389

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-jdfa
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1687

Comment Submitted by Kenneth Ayers

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## Submitter Information

**Name:** Kenneth Ayers

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## General Comment

Support President Trump's immigration reforms it's the right thing to do for the people in this country.

AR003390

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-j1pb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1688

Comment Submitted by Arlene Roberts

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## Submitter Information

**Name:** Arlene Roberts

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## General Comment

Please don't let others deter your duties and undermine the security of our nation by sneaky political schemes.  
Keep our country safe!

Keep up the dedicated and hard work to doing what is best for our nation. Thank you!!

AR003391

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-etie <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1689

Comment Submitted by Nicole Duncan

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## Submitter Information

**Name:** nicole duncan

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## General Comment

FIX THIS MADNESS

AR003392

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-1h75
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1690

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

As an advocate for immigrants and first generation American, I expect USCIS to be subject to transparency and accountability. The proposed removal of the 30 day period for adjudication of employment authorization applications by asylum seekers is a step away from long established and proven protocols designed to assist vulnerable applicants be self sufficient and to build tax revenue for our economy. This proposed rule change accomplishes none of the purported benefits and instead harms asylum applicants and our communities. First, USCIS presently adjudicates employment authorization document (EAD) applications within 30 days. If more time is needed e.g. proposed 60 days, USCIS should allow asylum seekers to file for their EADs at day 120 rather than day 150 to account for time to vet applicants and administrative processing. Second, as USCIS concedes, our government would lose significant tax revenue and reduce Medicare and social security contributions from employers. Many companies, like meat processing plants, and farmers cannot find workers for these unskilled or low skilled job positions. Immigrants, including asylum seekers, are willing to work these jobs while US citizens are not. Third, USCIS continuous mention of national security threats is a trumped up crisis. The vetting process starts the moment Border Patrol agents detain an undocumented person at the border. Border Patrol captures their biometric information and enter it into the IDENT system which allows Border Patrol to conduct identity checks using security databases like the FBI's or INTERPOL. All asylum seekers applying for an EAD have been subject to vetting at the border (if they entered the US unlawfully and picked up by Border Patrol agents or lawfully at a port of entry by CBP agents) and when they filed their asylum application (USCIS generates a biometric appointment after receiving the asylum application). Thus, it is disingenuous for USCIS to request additional time to run security checks when nearly all EAD applicants have already been subject to background checks before they submitted an EAD application. This is especially true for EAD applicants who were previously detained by DHS at one of their jails. No detainee is released without having been vetted via the use of biometric information to run security background checks. Fourth, the loss of income for asylum seekers will subject them to job exploitation, trafficking, and inability to pay for food, shelter, and medical care. Many asylum seekers are children and when their parents are unable to work it is a certainty that these children will be harmed. Fifth, this proposed rule change is another effort by the Trump administration to cruelly punish vulnerable asylum seekers fleeing persecution. Thank you for reading my comments.

AR003393



AR003394

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-81jh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1691

Comment Submitted by Robert Reinders

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## Submitter Information

**Name:** Robert Reinders

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## General Comment

Please allow our immigration officials enough time to vet out all asylum seekers to make sure we are safe!

AR003395

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-i6uk <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1692

Comment Submitted by Jay Salustro

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## Submitter Information

**Name:** Jay Salustro

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## General Comment

Asylum laws MUST be changed !!

AR003396

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6q-cz0i <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1693

Comment Submitted by Gary Hobbs

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## Submitter Information

**Name:** Gary Hobbs

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## General Comment

Give time to study them

AR003397

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-lvy0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1694

Comment Submitted by Peggy McClintock

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## Submitter Information

**Name:** Peggy McClintock

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## General Comment

I support our President's Immigration reform. We must take the time to investigate those who want to come to America. We definitely need the wall completed to stop those who are criminals from coming to America. I am so pleased that we have President Trump as our President and he has done more for America than any President in many years, Thank God for President Trump.

AR003398

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-mrvk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1695

Comment Submitted by Don Isgitt

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## Submitter Information

**Name:** Don Isgitt

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## General Comment

I strongly support President Trump's common sense immigration reforms, including removing the arbitrary 30 day limit on doing background checks.

AR003399

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-nfdf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1696

Comment Submitted by Richard Basinger

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## Submitter Information

**Name:** Richard Basinger

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## General Comment

Fight back! Quit laying down and giving up without a fight! I am tired of the left doing what they want with total dis-regard for the law!!!

AR003400

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-ix9c
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1697

Comment Submitted by Mary Hamill

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## Submitter Information

**Name:** Mary Hamill

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## General Comment

Too many foreigners in our country already put a freeze on all immigration. Don't let any more in. Deport all of them. No more illegals and no more immigrants for 20 years. They don't assimilate so they really don't want to be Americans.

AR003401



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-5evx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1698

Comment Submitted by Larry Foster

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## Submitter Information

**Name:** Larry Foster

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## General Comment

Let President Trump do his job! Undo this ridiculous timeline for holding illegals! I want our country safe even though you don't!!

AR003402

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-hxdh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1699

Comment Submitted by Will Tippit

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## Submitter Information

**Name:** Will Tippit

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## General Comment

Please protect our citizens and country from the evil of the cartels.

AR003403

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-c8ju
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1700

Comment Submitted by William Pelletier

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## Submitter Information

**Name:** William pelletier

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## General Comment

We need to stop cutting corners when we bring new people into the country we need to know who they are there past and have they done crimes in there countrys before we let them in

AR003404

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-11fn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1701

Comment Submitted by Gerald Biskner

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## Submitter Information

**Name:** Gerald Biskner

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## General Comment

Stop getting in the way of your President. Trying to save our country

AR003405

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6r-eyia <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1702

Comment Submitted by Betsy Scarborough

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## Submitter Information

**Name:** Betsy Scarborough

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## General Comment

If you care about Am, support President Trump.

AR003406

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-pizc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1703

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

In what world is keeping the ability to work from the most vulnerable populations a good thing? The continued scapegoating of those fleeing persecution is a distraction from the real problems facing our nation and citizens which so far seems to be working with a certain type of person, unfortunately. Please restore common sense to our immigration policies, not this mean-spirited and punitive approach, and instead focus on providing a system that works.

AR003407

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-63ri
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1704

Comment Submitted by Leland Moglen

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## Submitter Information

**Name:** Leland Moglen

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## General Comment

Uninvited intruders enter at their own risk, If they enter illegally, they are not here as guests. Our bad holding cells, substandard for American citizens, are usually better facilities than what they had in the country from which they flee. We have & should have plenary power to hold them until they can be adequately vetted, as long as that takes. They should be deported until they reenter legally.

AR003408

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-qgct <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1705

Comment Submitted by Adele Szymanowski

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## Submitter Information

**Name:** Adele Szymanowski

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## General Comment

We need to reform the Immigration laws. I know the Democratic Party is blinded by the prospect of new voters. No one should be allowed to come in illegally.

AR003409



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-wit4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1706

Comment Submitted by Kay Spencer

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## Submitter Information

**Name:** Kay Spencer

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## General Comment

Please support President Trumps immigration reforms removing the arbitrary timelines so that every immigrant can be thoroughly vetted before entering our country. I welcome lawful immigrants. I strongly object to the unlawful invasion of the United States of America.

AR003410

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-298g
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1707

Comment Submitted by Izmerai Alvarado

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## Submitter Information

**Name:** Izmerai Alvarado

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## General Comment

Please support president Trump's immigration reform policies that is ultimately for the good of our country.

AR003411

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-bfhs
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1708

Comment Submitted by Kermit Begly

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## Submitter Information

**Name:** Kermit Begly

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## General Comment

I am writing to urge you to remove the 30 day timeline to screen asylum seekers. Setting an arbitrary restriction of 30 days is forcing our officials to cut corners and not be as thorough as they should which impacts on the safety and security of the nation.

AR003412

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-dr2a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1709

Comment Submitted by Sara Rising

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## Submitter Information

**Name:** Sara Rising

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## General Comment

It is my firm belief that time is not allowed to complete Administrative investigations. It is also my belief that you have the ability to change this time line. Please be more honest and fair in your decisions.

AR003413

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6n-x93j <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1710

Comment Submitted by Henry Evans

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## Submitter Information

**Name:** Henry Evans

**Address:**

123 S. Main Aven

Suite 206

Sioux Falls, 57104

**Email:** henry.evans@evanslaw-pc.com

**Phone:** 6053679755

**Fax:** 6053300543

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## General Comment

A person seeking a good faith asylum under US law is not illegal. US law enables the person to work legally. Solve problem and keep the 30 day window. Otherwise, the government will further the problem of undocumented workers to the financial benefit of the anti-immigration law and the private shareholders who penal facilities that ICE operates.

AR003414

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-ctsu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1711

Comment Submitted by Tomas Duran

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## Submitter Information

**Name:** Tomas Duran

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## General Comment

Get rid of time limits on doing background checks, this is too important!

AR003415

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-ph5k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1712

Comment Submitted by Lynell Roberts

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## Submitter Information

**Name:** Lynell Roberts

---

## General Comment

People who come to our country should be checked out. 30 Days is not enough time to find out who these people are. Please fix this and give it more time so corners are not being cut and the people can be vetted properly.

AR003416

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-f0pj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1713

Comment Submitted by Abigail Molina

---

## Submitter Information

**Name:** Abigail Molina

**Address:**

4660 Main St suite 300-2

Suite 300-2

Springfield, OR, 97478

**Email:** abigail@molinalawgroup.net

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## General Comment

I am an immigration attorney. My asylum clients come fleeing very difficult situations and frequently have only the clothes on their backs. My clients are in dire need of employment authorization in order to support themselves and their families while completing the asylum process in the U.S.. Waiting 180 days after filing asylum is burdensome enough. Having USCIS prolong this duress indefinitely would significantly harm my clients.

AR003417



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-72vs <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1714

Comment Submitted by Ronald Pontinen

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## Submitter Information

**Name:** Ronald PONTINEN

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## General Comment

Back the president you idiots!!!!!!

AR003418

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-hc78
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1715

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am an aviation Structures Engineer and my asylum application is now pending for over 5 years. The Employment Authorization Document helped me support my family of four. I never used government assistance because I am able to work.

I am afraid, if the 30 days deadline is removed, the EAD process will be exactly like the assylum process. Pending cases would get lost in the backlog indefinitely with no option for the applicant to inquire about the status. As a victim of the "backlog" with no hope in sight, this proposed change is extremely bad for people like me and it will have a financial, psychological and health toll on us.

In addition, if the 30 day limit is removed, and resulted in people losing their jobs, it will affect both the applicant, the government and US tax payers. If we lose our job, we will be forced to ask the government for assistance to sustain our families. This would be a sad option for individuals like me who hate subsidies and can be a positive contribution to the US workforce.

I hope ther can be a similar rule that forces the government to process asylum cases that exceeded certain timeframe in the backlog.

God bless America.

AR003419

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-gfga
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1716

Comment Submitted by Bill Webster

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## Submitter Information

**Name:** Bill Webster

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## General Comment

It is time to get behind President Trump and support his immigration reforms. It takes time to vet people coming to this country and placing unrealistic time lines puts our country in danger: especially in these turbulent times.

AR003420

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-1i0e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1717

Comment Submitted by Faye Smith

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## Submitter Information

**Name:** Faye Smith

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## General Comment

Perhaps you have forgotten why you are in Washington, D.C. - to carry out the wishes and choices of the Americans who pay your salary and all your perks. Thus far you definitely have not earned your salary!!! Protecting this country is PRIMARY and if you dont know who and what is coming across our borders, then we are in serious trouble as evidenced by the illegals who are continuously breaking our laws in criminal activity. I respectfully ask you to get off your dead butts and work with the AMERICAN people and President Trump to get this massive mess under control NOW!!!

AR003421

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6n-aji9 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1718

Comment Submitted by Laryssa Kachmar

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## Submitter Information

**Name:** Laryssa KACHMAR

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## General Comment

Please support President Trump's immigration reforms. Give the Trump administration enough time to conduct thorough background checks on asylum seekers. Secure America's safety by securing our borders!

AR003422

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-khdl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1719

Comment Submitted by John Luthringer

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## Submitter Information

**Name:** John Luthringer

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## General Comment

We need to follow the law to vet Illegals without a timeline. Support president Trumps reforms

AR003423

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-6zon <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1720

Comment Submitted by Thomas Little

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## Submitter Information

**Name:** Thomas Little

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## General Comment

Remove unnecessary timelines in pursuit of true immigration reforms

AR003424

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-aiku
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1721

Comment Submitted by Mary Cole

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## Submitter Information

**Name:** Mary Cole

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## General Comment

We need to reform our immigration policies by allowing more time for personal background checks. This is what the American citizens want. Do the right thing for a change and stop impeding President Trump and the will of We the People!

AR003425



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-4e7r
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1722

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I have over 14 years of experience working with immigrants and especially asylum seekers. Some come here with barely any belongings. They come here and rely on community and family. They are able and eager to work. They don't want any benefits or feel like a burden. Providing them with a work permit will faster enable them to find a job and pay their own way. They will be able to pay their own rent, food, health insurance and even for their children. They don't want anything for free, they just want to work and be independent.

AR003426

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-etpm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1723

Comment Submitted by Raymond Stansbury

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## Submitter Information

**Name:** Raymond Stansbury

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## General Comment

I would just prefer to see all Democrats drowned.  
They are harmful to the environment.

AR003427

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-fvnp
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1724

Comment Submitted by Nancy Clark

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## Submitter Information

**Name:** NANCY CLARK

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## General Comment

it is time to completely close the border to anyone. It has been done before!

AR003428

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-sk32
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1725

Comment Submitted by Tatiana Moreno

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## Submitter Information

**Name:** Tatiana Moreno

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## General Comment

This proposal defeats the purpose of employment authorization. This causes harm to asylum seekers and their families. It affects families that are struggling and living in desperation and fear. The additional financial burden that this causes government agencies is undeniable.

AR003429

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-7q2y
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1726

Comment Submitted by Susan Cohen, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

---

## Submitter Information

**Name:** Susan Cohen

**Address:**

Mintz et al  
One Financial Center  
Boston, MA, 02111

**Email:** sjcohen@mintz.com

**Phone:** 617-348-4468

**Fax:** 617-542-2241

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## General Comment

DHS Docket No. USCIS-2018-0001

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## Attachments

Mintz Comment\_ Opposition to Proposed Change for Asylum EAD

AR003430

Susan J. Cohen  
617 348 4468  
sjcohen@mintz.com



One Financial Center  
Boston, MA 02111  
617 542 6000  
mintz.com

November 7, 2019

*Submitted Via Federal e-Rulemaking Portal*

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue NW  
Mailstop #2140  
Washington, D.C. 20529-2140

**RE: Opposition to Proposed Federal Rule “Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications,” DHS Docket No. USCIS-2018-0001**

Dear Ms. Deshommes,

For several decades, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. has operated a robust pro bono immigration program representing hundreds of asylum seekers and their families. As part of this service, Mintz provides assistance with Employment Authorization Document (EAD) applications so clients can support themselves and their families while navigating the difficult asylum process. Mintz attorneys also support the work of non-profit organizations such as the Political Asylum/Immigration Representation (PAIR) Project, and Kids in Need of Defense (KIND). At any given time, these two organizations represent hundreds of asylum-seekers who have fled persecution from over 90 countries worldwide.

Mintz strongly opposes the proposed rule, “Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications” (Sep. 9, 2019), DHS Docket No. USCIS-2018-0001 (hereinafter, the proposed rule), which would eliminate the requirement that DHS adjudicate initial requests for employment authorization by asylum applicants within 30-days of filing.

The proposed rule would cause severe economic hardship for many of Mintz’s asylum clients, who depend on employment authorization to support themselves and their loved ones. Excessive delays in work authorization would deprive families of desperately needed income and threaten their financial survival in the U.S.

An asylum seeker is an individual who fears significant bodily harm, including torture, sexual abuse, murder, and hate crimes, on account of a protected ground. Many asylum seekers flee

their home countries hurriedly, with little to no financial support or means. The United States has historically offered refuge to asylum seekers from around the world. The proposed rule would place a significant barrier to seeking this protection. Under the proposed rule, the government would have unlimited time to process work authorization applications. While DHS claims the EAD applications would be adjudicated largely within two months' time, this position is not supported by the facts. DHS already faces backlogs in almost every benefit category, and would have no incentive to issue prompt decisions. The adjudication timeline would most likely be excessively long and deprive asylum seekers of a legal means of income.

Delays in issuing EADs would force asylum seekers, already vulnerable individuals, to depend on the charity of others. Without the identification that an EAD provides, families seeking asylum also would face difficulties accessing healthcare and education.

The proposed rule also is not in the economic interest of the United States which benefits greatly from the contributions of refugees and asylum seekers. As illustrated below, the 180-day waiting period before asylum seekers are eligible for work authorization is already lengthy and creates severe hardships.

Furthermore, the proposed rule is unnecessary given that DHS already adjudicates 90% of EAD applications within 30 days. Finally, DHS's claim that longer processing times would prevent and correct fraud is contradictory. Instead, an excessive backlog would delay the detection of any fraudulent applications.

### **1. Eliminating the 30-day adjudication requirement would have a direct and severe economic impact on Mintz's clients**

Mintz is currently representing dozens of clients seeking asylum who would be negatively impacted by the proposed rule, in addition to the thousands of others around the United States that would face imminent economic harm. Asylum seekers already face delays in employment authorization because of statutory requirements backlogs, and adjudication delays. With a return to the Asylum Office's First in, First out policy, asylum applicants face additional difficulties in receiving a decision on their cases. Many asylum seekers wait months or years for a final decision.

The time spent waiting for an EAD compounds these hardships by depriving families of financial support. Asylum seekers are already required to wait a lengthy period of 180-days before they are eligible for work authorization. Mintz is representing several clients that have faced significant hardships by delays that would be prolonged by the proposed rule.

Mintz is currently representing Ali and his family, originally from Turkey. Ali worked as a judge in Turkey, and came to the U.S. to complete a PhD program on his government's sponsorship. While studying in the U.S., the political tide shifted in Turkey against judges like Ali. If he were to return to Turkey, he would be arrested and made a political prisoner. For the safety of himself

and his family, Mintz assisted Ali in applying for political asylum. While awaiting the statutory period for EAD adjudication, Ali was unable to work and forced to rely on the kindness of acquaintances in the Turkish immigrant community. During this time, his young daughter developed severe medical needs after she was hit by an oncoming car. Ali and his community struggled to pay the medical expenses and keep his family afloat while urgently awaiting employment authorization. It wasn't until approximately nine months after his asylum application was filed, that Ali was again able to work and support his family. Any additional delay in his employment may have had disastrous effects on his family's wellbeing.

Mintz also represents Umaru, a graduate student from Nigeria. Umaru is a published author and a successful scholar in his field. As such, he is often asked to speak at events and conferences. When Umaru was unable to return to Nigeria out of fear for his life and safety, Mintz helped Umaru apply for political asylum. Umaru was unable to work during this time while awaiting his EAD card. He continued to give lectures and speeches, but was unable to accept any honorarium or even apply for jobs. Even though he has a successful career, Umaru was unable to pay rent on his own and needed to ask for help from his friends, family, and his lawyers. Umaru was critically dependent on his community until obtaining work authorization. The proposed change in EAD adjudication timelines would severely affect asylum seekers like Umaru.

The proposed rule would worsen the existing difficult situation faced by many asylum seekers. Without a time limit for processing initial applications, DHS would have no incentive to adjudicate these cases in a timely manner and asylum seekers who are statutorily eligible to work would be unable to do so for an unknowable period of time.

## **2. The proposed rule would harm the United States' economy**

The basis for this proposed rulemaking is that DHS seeks to divert resources away from EAD adjudications. This decision would have disastrous economic effects that far outweigh any resources DHS seeks to conserve.

It is well established that ensuring that asylum applicants secure lawful employment benefits the economy of the United States. Immigrants represent one quarter of all the entrepreneurs in the country, while only making up 15 percent of the population. Businesses both small and large that are owned and operated by immigrants contribute to job growth, innovation, and economic stability. Asylum seekers, refugees, and immigrants hire American workers and contribute to the United States' standing as an economic power of the world.

The asylum applicant and refugee population is a vital contributor to U.S. economic success and federal revenue. Refugees and their families have contributed \$343 billion in revenue to federal, state, and local coffers, which represents \$63 billion more than they received in benefits from government programs, according to the Department of Health and Human Services. Asylum seekers need only be given the opportunity to work to contribute significantly to the U.S. economy.



Therefore, the proposed rule to eliminate the 30-day adjudication requirement not only would pose hardship to families but also would be a detriment to the national economy. Federal and local governments are not alone in the loss of revenue. As DHS notes, businesses that rely on the work of asylum seekers and immigrants would suffer from a loss of productivity and a strain on their existing workforce. U.S. corporate executives know that the work provided by immigrants and refugees is invaluable and necessary to grow their businesses. The department acknowledged that this loss in economic gain is immeasurable.

### **3. DHS is capable of adjudicating these applications within 30 days of filing**

USCIS is capable of adjudicating EAD applications within 30 days, and allowing asylum seekers to gain lawful employment within a reasonable period of time. For example, in December 2018, DHS reported adjudicating 96.3% of asylum-seekers' initial applications for employment authorization within 30 days.

The agency is required to maintain this timeline by federal regulation. After July of 2018, USCIS was ordered to adjudicate these applications within 30 days to maintain compliance with the agency's obligations under 8 C.F.R. 208.7(a)(1). *See, Rosario v. USCIS*, Case No. C15-0813JLR (W.D. Wash. July 26, 2018), at 10-11 (noting that DHS's "achieved a 96.3% compliance rate with 8 C.F.R. 208.7(a)(1) in December 2018, and an average compliance rate of 92.7% for the final quarter of 2018.").

The agency is not incapable of adjudicating asylum seeker's employment authorization applications within a reasonable time, but rather unwilling to do so despite the clear economic detriment.

### **4. DHS's concerns related to asylum fraud are unfounded given its robust system of security checks and fraud detection**

DHS's concerns related to fraud and national security are unfounded, and the proposed rule offers no solution to fraud that may occur. DHS already maintains a robust system of security checks and a staff of officers highly trained in fraud detection. The department's goals are better served by quickly processing and investigating the application, rather than creating delays. As mentioned above, DHS currently decides over 90% of the EAD applications within the 30-day processing timeline, demonstrating that DHS is able to address fraud and security concerns within the current timeframe and process.

### **5. Mintz's opposition to the proposed change to Eliminate the 30-day processing requirement**

If their work authorization is delayed, families seeking asylum would have to rely on other sources of funding, if other sources exist. Asylum applicants will be unable to build their lives, contribute to the economy, or even maintain a basic standard of living while their EAD application is pending. Mintz's clients will lack government identification vital for starting school, receiving medical care or navigating life in the United States.

Seeking safety and protection is an unequivocal legal right. The proposed rule undercuts this fundamental right because DHS seeks to deprive asylum applicants the tools to survive financially. Mintz clients and other asylum seekers will be faced with an impossible choice between seeking safety and meeting their basic needs. The rule would obscure the asylum pathway and place a serious burden on the most vulnerable immigrants. We strongly oppose the proposed rule and suggest that it be withdrawn in the interest of justice, economic stability, and human decency.

We respectfully request that DHS withdraw the proposed rule and continue to process EAD applications within 30 days pursuant to existing regulatory obligations.

Sincerely,

Susan J. Cohen  
Member / Founding Chair, Immigration Practice

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-az2l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1727

Comment Submitted by Missie Hickey

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## Submitter Information

**Name:** Missie Hickey

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## General Comment

Please help President Trump and Ken Kucinelli make the immigration reforms we've needed for many decades.

AR003436

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-r3ms
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1728

Comment Submitted by Sharron Boyaagian

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## Submitter Information

**Name:** Sharron Boyaagian

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## General Comment

Please support President Trumps Immigration Reforms.!

We need to help him to suppress Immigration by way of investigating about these people, before they are allowed to come into our country!

AR003437

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-q5ju
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1729

Comment Submitted by Andrea Wargo

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## Submitter Information

**Name:** Andrea Wargo

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## General Comment

Support President Trump's Immigration Reforms. Legal Immigration= Good. ILLEGAL Immigration= Bad. The financial burden to our country is huge. Crime by illegals is fully documented. Hordes of illegal immigrants swarm our schools, family services and welfare system, and they fail to assimilate into our American culture. AMERICA FIRST!

AR003438

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-87s0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1730

Comment Submitted by Velma Marshall

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## Submitter Information

**Name:** Velma Marshall

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## General Comment

I ask that you support President Trump's immigration reforms. I believe that they will make our country safer.

AR003439

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-n2vi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1731

Comment Submitted by James Crooks

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## Submitter Information

**Name:** James Crooks

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## General Comment

I don't want any here they're all criminals ,rapists and thrives and free loaders I worked hard all my life for what I have only to have the Dems gives them everything for nothing it's wrong ,wait til they come to your house

AR003440

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-9i0n
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1732

Comment Submitted by Roberta Mohlman

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## Submitter Information

**Name:** Roberta Mohlman

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## General Comment

Yes Sir, my husband and I support President Trumps border and immigrant reforms! We cannot have non vetted people coming into our country that could be dangerous or harmful. Sincerely, Ted and Bobbie Mohlman!

AR003441



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-koz4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1733

Comment Submitted by Doonald Heacock

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## Submitter Information

**Name:** Doonald Heacock

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## General Comment

For God's sake. Just look at the Squad. We have million of Christians displaced. Offer then asylum now.

AR003442

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-3vuv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1734

Comment Submitted by Michael Weaver

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## Submitter Information

**Name:** Michael Weaver

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## General Comment

Expand the time period for federal officials to complete background checks on immigrants.

AR003443

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-8dm9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1735

Comment Submitted by Johanna Rau

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## Submitter Information

**Name:** Johanna Rau

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## General Comment

Please stop all the nonsense and start working with our President to process legal immigration and turn illegals back to their own country until they apply properly.

AR003444

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-ultw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1736

Comment Submitted by Robert Bartlett

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## Submitter Information

**Name:** Robert Bartlett

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## General Comment

If democrats won't give Immigration enough time to process illegal immigrants , Then they should go back across the border to Mexico or back to their home Country

AR003445

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-bavg <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1737

Comment Submitted by Cathy Amon

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## Submitter Information

**Name:** Cathy Amon

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## General Comment

Anyone coming into this country to live should have a complete, thorough background check. There should be NO timeline to complete this effort. It takes my husband weeks just to hire an employee, so why should there be such a short deadline on something so much more important?

AR003446

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-q3zw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1738

Comment Submitted by Myrna Curtis

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## Submitter Information

**Name:** Myrna Curtis

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## General Comment

SUPPORT PRESIDENT TRUMPS POLICIES!!!! OR GO TO A SOCIALIST COUNTRY TO LIVE!!! DON'T TRY MAKING AMERICA INTO A SOCIALIST COUNTRY!! YOU HAVE PLENTY TO CHOOSE FROM, IF YOU WANT SOCIALISM!!!

AR003447

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-792f
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1739

Comment Submitted by Jason Klein

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## Submitter Information

**Name:** Jason Klein

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## General Comment

The radical left are forcing the Trump Administration to cut corners and make America less safe through an unrealistic timeline preventing any possibility of vetting asylum seekers. President Trump and Ken Cuccinelli are trying to secure America, but these radical restrictions put forth by bureaucrats jeopardize our national security and punish legal immigrants for obeying our laws. I believe their real intent is to keep our immigration system broken and undermine Donald Trumps presidency.

Please help President Trump secure Americas safety by removing this arbitrary bureaucratic timeline.

AR003448

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6q-qri6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1740

Comment Submitted by Harold Hart

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## Submitter Information

**Name:** harold hart

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## General Comment

Trumps immigration reforms are a MUST.

AR003449



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-fqb1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1741

Comment Submitted by Stephanie Hughes

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## Submitter Information

**Name:** stephanie hughes

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## General Comment

You have to protect all americans from  
illegals that are not good people/

AR003450

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-7f4i
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1742

Comment Submitted by Joseph Pero

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## Submitter Information

**Name:** Joseph Pero

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## General Comment

As an immigrant to this great country, I implore you to safeguard our borders by helping our President by removing timelines for asylum seekers. Wouldn't it be a novel idea if you all did your jobs instead of wasting time trying to impeach our President for nonsensical reasons!

AR003451

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-q2mt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1743

Comment Submitted by David Galloway

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## Submitter Information

**Name:** David Galloway

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## General Comment

Give President Trump the proper power to deal with immigration and support him on his immigration reform.

AR003452

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-h9om
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1744

Comment Submitted by Trace Ellward

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## Submitter Information

**Name:** Trace Ellward

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## General Comment

Make the entire border a military base/zone. Make I.C.E. a branch of the military. Build the Wall. Protect your citizens. Do what, We The People, tell you to do.

AR003453

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-68qe
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1745

Comment Submitted by Pyara Chauhan

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## Submitter Information

**Name:** Pyara Chauhan

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## General Comment

Please make sure that President Trump is given sufficient time to process the illegals who are subject to deportation.

AR003454

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-3q3c
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1746

Comment Submitted by Donna Bleiler

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## Submitter Information

**Name:** Donna Bleiler

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## General Comment

Give the Trump Administration enough time to thoroughly check the background of every asylum seeker, and not risk the security of this country by cutting corners.

AR003455

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-lzvd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1747

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Eliminating the 30 day deadline will result in great harm to asylum seekers who have already been through so much and are just trying to make a living. Keep the 30 day policy in place and ensure asylum seekers are able to support themselves and their families!

AR003456

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-n97j
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1748

Comment Submitted by Carla McBryde

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## Submitter Information

**Name:** Carla McBryde

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## General Comment

Please support President Trump's Immigration Reform. Get rid of everybody that doesn't want the Immigration Reform. It's time to support President Trump. He's making the right decisions to protect America.

AR003457



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-ycqy
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1749

Comment Submitted by Mike Byrne

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## Submitter Information

**Name:** Mike Byrne

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## General Comment

Please help President Trump secure Americas safety with his Immigration Reforms by removing the arbitrary bureaucratic timeline.

AR003458

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-z8r1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1750

Comment Submitted by Donna Bober

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## Submitter Information

**Name:** Donna Bober

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## General Comment

Please do the job you were elected to do and support President Trumps immigration reform so that US citizens will be safe. Your own citizens should be recognized and respected before some illegal immigrant seeking false asylum. Most of these people are not telling the truth and use excuses that our lax laws permit in order to apply for asylum when all they are really seeking is a free ride, full of entitlements, from the American taxpayers. DO YOUR JOB AND PROTECT US, THE UNITED STATES CITIZENS, OVER ILLEGALS!!!

AR003459

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-xkoh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1751

Comment Submitted by Michele Pistone

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## Submitter Information

**Name:** Michele Pistone

**Address:**

Villanova University  
299 N Spring Mill Road  
Villanova, PA, 19085

**Email:** pistone@law.villanova.edu

**Phone:** 610-519-5286

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## General Comment

I have represented asylum seekers for more than 20 years. This rule is a bad idea for many reasons. It is inconsistent with our values as a nation. Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR003460

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-gdz4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1752

Comment Submitted by Margery Bridge

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## Submitter Information

**Name:** Margery Bridge

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## General Comment

Please support President Trumps Immigration Reforms to protect the American citizens. We have been brutally abused and killed by Illegal Immigrants enough already.

AR003461

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-wudq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1753

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I have worked with asylum seekers and other immigrants for over 25 years. I am writing to voice my concern and opposition to the proposed rule. The 30-day adjudication timeline provides some measure of security and predictability to asylum seekers who are already some of the most vulnerable members of our communities. There is absolutely no reason to delay the processing of the employment authorization documents beyond the 30 day rule. The concern that people may be submitting an application for asylum just to obtain a work permit was addressed when the regulations were amended years ago by requiring a 150 day wait period to apply for employment authorization. Currently the policy with the adjudication of asylum applications was changed in February 2018 to interview under LIFO (Last in First Out) with the newly filed applications being interviewed ahead of the older filings) and therefore many frivolous and/or applications that are denied on the merits, will not be able to submit an application to obtain employment authorization. Introducing further delays and increased unpredictability into the process of obtaining a work permit by legitimate asylum seekers who have already been vetted several times before being able to submit their applications, only increases the time asylum-seeking families must rely on charity or other outside support (or worse, are barely able to get by, facing food insecurity, homelessness, etc.). Lack of work permits prevents them from gaining employment, supporting themselves, and spending into their local economies and the national tax base (note: USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year). Lack of a work permit also often means inability to gain a state ID or license, which can cause access issues for health care, community services, homeless shelters, and other necessary social supports.

These individuals are also more vulnerable to exploitative employers or worse, trafficking. The lack of having employment authorization with applications languishing at the USCIS office, with no fault of the applicant, also causes emotional and psychological harm. The delay will also lead to exploitation of this community by unscrupulous organizations such as Notarios.

Asylum seekers face barriers at every step, from fleeing from violent and oppressive regimes, to their perilous journey to the U.S., to navigating the complex immigration laws to present their asylum claims. Our immigration

AR003462

laws need to be designed to embrace the dynamism that migration brings to this country.

As an alternative to this proposed rule, and if the issue is that USCIS claims to need more than 30 days to adjudicate applications and vet applicants, then USCIS should simply allow applications to be submitted further in advance of the 180-day mark, such as at 120 days, which would allow 60 days for adjudication and vetting.

AR003463

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1754

Comment Submitted by Celeste Valente

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## Submitter Information

**Name:** celeste valente

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## General Comment

I am a private citizen, active in a local church that advocates for compassion and kindness to asylum seekers and those who are vulnerable. Proposing a delay in the 30-day rule to allow work ID for asylum seekers makes no sense. Delaying the processing of work ID would prevent the individual and his/her family from the means to support his/her family unit, access insurance and contribute to the public coffers by purchasing in the local economy and paying taxes both federally and locally.

The proposed delay is purely vindictive and will not accomplish anything positive for asylum seekers or our society.

Thank you for considering my comments.

AR003464

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-h83f
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1755

Comment Submitted by Wendy Bennage

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## Submitter Information

**Name:** Wendy Bennage

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## General Comment

Please give President Trump the means and the time necessary to keep us all safe! Thank you!

AR003465



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-d65k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1756

Comment Submitted by Ryan Brewer

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## Submitter Information

**Name:** Ryan Brewer

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## General Comment

I write to oppose the removal of the 30-day processing provision. I know dozens of asylum-seekers whom rely on their ability to work in this country to provide for themselves and other family that need support. Without the ability to work, asylum seekers awaiting confoundingly distant hearings will needlessly suffer.

AR003466

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-60ff
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1757

Comment Submitted by James Lewis

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## Submitter Information

**Name:** James Lewis

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## General Comment

Islamist migrants will never assimilate. We have watched them for years now and the not only segregated themselves into their own communities, they also act if those communities are sovereign nations and No Go Zones for infidels. Do NOT let the UN bully America to accept them or there will catastrophic consequences for Americans.

AR003467

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-ovge
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1758

Comment Submitted by Norman Wieland

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## Submitter Information

**Name:** Norman Wieland

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## General Comment

I have come to believe that the Democrats want to see president Trump fail. it seems that the only thing Democrats are doing is attacking president Trump. I havent heard of anything they are doing for America.Personally I think all progressive liberals should leave America.

AR003468

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-iq17
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1759

Comment Submitted by Doris Guffey

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## Submitter Information

**Name:** Doris Guffey

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## General Comment

Help president Trump!  
stop hindering him in securing our boarders! Support immigration reform!

AR003469

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-4t5f
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1760

Comment Submitted by Patricia Kandrick

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## Submitter Information

**Name:** Patricia Kandrick

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## General Comment

Please support President Trump's common sense immigration reforms. Make Americans count first. Especially Veterans. Thank you.

AR003470

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-ljyq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1761

Comment Submitted by Patricia Billings

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## Submitter Information

**Name:** Patricia Billings

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## General Comment

It is important to support President Trump's  
Immigration Reforms -- against Globalists!

AR003471

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-8htj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1762

Comment Submitted by Susan Strait

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## Submitter Information

**Name:** Susan Strait

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## General Comment

Stop obstructions on our border security and allow President Trump to expand our security and border agents to do their jobs. Please take care of our citizens. Tell Congress ans especially the house to stop obstruction and do their jobs!!!!

AR003472

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-b75e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1763

Comment Submitted by Mark Miller

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## Submitter Information

**Name:** Mark Miller

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## General Comment

Support Trump's immigration reforms. My safety and security is important. Without voters U won't have a job.

AR003473



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-hoyn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1764

Comment Submitted by Lawrence Melde

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## Submitter Information

**Name:** Lawrence Melde

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## General Comment

All you do nothing democrats start backing our President! We voted him into office and you do nothing but try to take my vote away! Support President Trump and his immigration plan! Or we'll vote you do nothing democrats out of office!

AR003474

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-io2k
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1765

Comment Submitted by Michael Holdcraft

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## Submitter Information

**Name:** Michael Holdcraft

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## General Comment

I am seriously concerned that some career government officials are not supporting our Presidents Immigration reforms. I am asking that you do all you can to ensure that all persons wishing to enter the United States be fully vetted before they are allowed entry. Any arbitrary timeline that does not allow a complete security background check should be opposed.

AR003475

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-zo8r
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1766

Comment Submitted by Yamira Acevedo

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## Submitter Information

**Name:** Yamira Acevedo

**Address:**

1969 S. Alafaya Tr #190

Orlando, FL, 32828

**Email:** Immigrationlaw.info@gmail.com

**Phone:** 8447075

**Fax:** None

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## General Comment

Asylum seekers already have a waiting period before they actually can apply the 30 day rule makes it reasonable compare to other applicants that have no waiting period. So delaying the access will just place the asylees in greater prolong unreasonable burden..

AR003476

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-t2r6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1767

Comment Submitted by Cole Fredrick

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## Submitter Information

**Name:** Cole Fredrick

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## General Comment

Please for common sense handling of immigration properly, do things right and support President Trump's Immigration Reforms put together by historical minds, and current intelligent minds for our safety, our health, and everyone's well being.

AR003477

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-185f
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1768

Comment Submitted by Bobby Warren

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## Submitter Information

**Name:** Bobby Warren

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## General Comment

We as an American citizen we need to change the law and give the 30 day to check out the immigrant our country deserves it work with our president and get it done please

AR003478

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-lvcm <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1769

Comment Submitted by Sarah Morris

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## Submitter Information

**Name:** Sarah Morris

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## General Comment

Remove the 30 day time limit for reviewing immigrant requests and allow adequate time to complete the review and investigation into the background of each immigrant.

AR003479

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-ozzm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1770

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Help people who are escaping horrible situations in their home countries be able to be in a (so far) free country, and be able to work and help themselves and their families by earning a living. Putting yet another restriction on people who have suffered indescribably is inhumane and ridiculous. And for supporters of Trump who complain that people come here and don't work, here he is trying to block their ability to gain authorization to do so!

AR003480

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-pk0w
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1771

Comment Submitted by Adam Roberts

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## Submitter Information

**Name:** Adam Roberts

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## General Comment

My name is Adam Roberts and I am an immigration attorney practicing in Greensboro, North Carolina. On a daily basis, I have the opportunity to meet and speak with asylum seekers. Therefore, I have first hand knowledge on why it is so important to have asylum seekers be able to enter the work force as quickly as possible.

Harm Caused to Asylum Seekers. Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

Lost Tax Revenue for the Government. USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

Therefore, for these reasons it is imperative that an individual seeking asylum has a process to enter the work force as quickly as possible.

AR003481



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-til5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1772

Comment Submitted by Jeff Fabacher

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## Submitter Information

**Name:** Jeff Fabacher

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## General Comment

Please stand with the POTUS and provide ICE enough time to thoroughly check the background of every asylum seeker, to make America safer.

AR003482

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-khqz <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1773

Comment Submitted by Dianna Dasher

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## Submitter Information

**Name:** Dianna Dasher

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## General Comment

Why not check background on immigrants, what do you have to lose. I would like to know who is entering my country and for what reason.  
Thank you.

AR003483

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-oxou
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1774

Comment Submitted by Henry Rodriguez

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## Submitter Information

**Name:** Henry Rodriguez

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## General Comment

Delays in asylum seekers getting their work authorization (Employment Authorization Document or "EAD") approval can lead to:

- Lost income to the asylum seeker and their family, as well as lost tax revenue for the U.S.;
- Hunger for them and their families;
- Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID;
- Risk of homelessness/housing insecurity, which burdens local infrastructure;
- Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify), which will burden local hospital emergency rooms;
- Vulnerability to exploitation, trafficking, and underground economy risks, making our communities more susceptible to crime;
- Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income);
- Loss of ability to support themselves and their families;
- Feelings of fear, desperation, and overall mental health concerns.

AR003484

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-km70
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1775

Comment Submitted by Mike Bolton

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## Submitter Information

**Name:** Mike Bolton

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## General Comment

Keep up the good work

AR003485

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-hi13
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1776

Comment Submitted by Jannette Schuler

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## Submitter Information

**Name:** Jannette Schuler

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## General Comment

I am asking for your support for President Trump's Immigration reforms. They are necessary to keep this country to a place of safety.

AR003486

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6n-47qx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1777

Comment Submitted by Steve Wegner

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## Submitter Information

**Name:** steve Wegner

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## General Comment

You need to support immigration reforms !!!

AR003487

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-69mt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1778

Comment Submitted by Cynthia Keys

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## Submitter Information

**Name:** Cynthia Keys

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## General Comment

Please support President Trump^s immigration reforms now! This has dragged on for far too long. He is by God the legal president of this country.

AR003488

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6q-unul <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1779

Comment Submitted by John Sandeen

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## Submitter Information

**Name:** John Sandeen

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## General Comment

To those of you in California, either support the President or "We the people" of California, will vote you out of office!

AR003489



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-mbem <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1780

Comment Submitted by David Mitchell

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## Submitter Information

**Name:** David Mitchell

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## General Comment

Well heres my views on things. If you are not being given enough time to do a job that demands perfection. Dont do the job error on caution if you dont have the time to do it right dont let them in deny them into our country. I dont need anymore deadbeats into my country anyways . I didnt serve my country for many years just so others can come into my country and destroy it.

AR003490

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-i0jc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1781

Comment Submitted by Robert Tocci

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## Submitter Information

**Name:** Robert Tocci

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## General Comment

Our politicians give taxpayers money to other countries so that they can secure their borders.  
Those same politicians refuse to secure the United States Borders.  
That's the definition of INSANITY !

AR003491

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-ubnr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1782

Comment Submitted by Eugene Livesay

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## Submitter Information

**Name:** Eugene Livesay

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## General Comment

President Trumps immigration reforms need to be supported for the protection of our nation.

AR003492

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-cm73
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1783

Comment Submitted by Milton Christopher

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## Submitter Information

**Name:** Milton Christopher

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## General Comment

Please secure our country by supporting the President and his plans for immigration reform. It's time to correct this messed up system and to protect the true American people.

AR003493

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-w5ho
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1784

Comment Submitted by R Habich

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## Submitter Information

**Name:** R Habich

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## General Comment

There's a lot at stake by delaying employment authorization documents to asylum seekers. Specifically, USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. Additionally, USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security. USCIS has reported that it has been able to decide over 99% of EADs within the 30-day time frame for over the past year. Therefore, this proposed rule change is simply this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin.

AR003494

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-fmt0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1785

Comment Submitted by Collette Taylor

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## Submitter Information

**Name:** Collette Taylor

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## General Comment

To whom it may concern,

With the many applicants seeking asylum, we need to give the processors more time to do background checks. Please keep our country safe by extending the time period for a proper background check on those wishing to enter this great country.

Collette Taylor

AR003495

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-lgaq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1786

Comment Submitted by Matt Olsman

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## Submitter Information

**Name:** Matt Olsman

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## General Comment

This rule should not be eliminated. Asylum seekers must work to survive and already arent allowed to work for 6 months after applying. Eliminating this rule is shortsighted and you must not do it

AR003496

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6o-kb8u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1787

Comment Submitted by Ruthellen Yildiz

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## Submitter Information

**Name:** ruthellen yildiz

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## General Comment

Please stand with President Trumps immigration reforms!!! With the magnitude of the numbers of people at our boarder the time line that has been forced on the immigration officials is putting us in danger from criminals that keep being let in to our country, and is totally unfair to the immigrants that truly need asylum and are trying to do things legally! The time line is totally forcing short cuts that are endangering all Americans and all the people who need to come in legally! Back Trumps reforms and keep us safe!!!

AR003497



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-oy4a <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1788

Comment Submitted by Raymond Hancock

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## Submitter Information

**Name:** raymond hancock

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## General Comment

do your job and help President Trump take care of our borders.

AR003498

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-dwk5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1789

Comment Submitted by Jean Finke

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## Submitter Information

**Name:** Jean Finke

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## General Comment

It is important to give the Trump Administration time to thoroughly check out every asylum seeker's background! Don't let some arbitrary timeline end this important function early.  
This is for the safety of our country!

AR003499

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-w2re
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1790

Comment Submitted by Terry O'Neel

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## Submitter Information

**Name:** Terry O'Neel

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## General Comment

Do not rush through background investigations. To do a job properly it takes time. U.S. citizens lives stand in the balance of improperly vetted immigrants.

AR003500

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-mt45
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1791

Comment Submitted by Linda Theiss

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## Submitter Information

**Name:** Linda Theiss

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## General Comment

I'm sick of the insanity. We, the people, want and expect our lawmakers to do everything possible to keep us safe. Catering to illegals is NOT what you are there to do.  
Stop the madness. Do your jobs.

AR003501

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-yzi0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1792

Comment Submitted by Jonathan Martin

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## Submitter Information

**Name:** Jonathan Martin

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## General Comment

Please give the Trump Administration enough time to thoroughly check the background of every asylum seeker by removing the timeline. This will help secure America's safety.

AR003502

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-6k57
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1793

Comment Submitted by John Holte

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## Submitter Information

**Name:** John Holte

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## General Comment

Why are the democrats causing danger to the public?

AR003503

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-yqp5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1794

Comment Submitted by Lana Carey

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## Submitter Information

**Name:** Lana Carey

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## General Comment

I am concerned that you do not seem to realize the impact on your fellow Americans. To me if you cannot abide with our laws, you do not belong here! If you do not want to learn how to join us all it does is create more problems. The President is on the right track to help us get out of the mess we are in. We must know who is walking through the doors. I have had many friends that have come into this Country the right way, then took all the right paths to obtain citizenship. Hard working individuals who wanted to be part of this amazing Country. Please realize if you really want to be a upstanding citizen, you are willing to go through that waiting period to show your love of wanting to live here.

AR003504

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6n-myew <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1795

Comment Submitted by George Burke

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## Submitter Information

**Name:** George Burke

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## General Comment

The rday. I do not want to give illegals all of my citizenery benefits.alse

AR003505



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-4jgi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1796

Comment Submitted by Mathew Moen

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## Submitter Information

**Name:** Mathew Moen

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## General Comment

Support the people of America, by supporting duly elected by the people for the people Donald Trump POTUS.  
Support his Immigration Reform.  
STOP these crimes against our POTUS by the Democrat radical party.

AR003506

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-yc0h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1797

Comment Submitted by Teresa McDaniel

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## Submitter Information

**Name:** Teresa McDaniel

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## General Comment

No longer safe in my own house, selling out and finding a cave

AR003507

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6p-czsf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1798

Comment Submitted by Geneva Lehman

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## Submitter Information

**Name:** geneva lehman

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## General Comment

What has happened to Congress?

Stop the birthright citizenship garbage

Also stop and get some backbone and uphold the Constitution as you swore to do. Maybe we should hold classes on the Constitution so you at least know what you swore to do for America.

As a veteran I swore to uphold it and that is a life time commitment as it should be for you.

We Americans are fed up with all the garbage you are doing either stand up for us or go back home.

AR003508

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-3kj9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1799

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

That rule would be si harmful for asylum seekers, most asylum applicants live off their jobs, if we get to the point where it could take 6 months and more to obtain work authorization then a lot of them will be with no income and no way to live. Please don't let this happen

AR003509

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6o-7ix1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1800

Comment Submitted by Misty Cummings

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## Submitter Information

**Name:** Misty Cummings

**Address:**

223 SE 53rd Ave.

Portland, OR, 97215

**Email:** reneecee2003@yahoo.com

**Phone:** 5033123378

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## General Comment

Asylum seekers need to have quick access to work authorization so that they can support themselves during the time that their claims are being decided. These are people who are less likely to have community or family support and no other way to support themselves.

AR003510

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-9o97
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1801

Comment Submitted by Charles Miller

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## Submitter Information

**Name:** Charles Miller

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## General Comment

NO amnesty, NO refugees, NO illegal immigrants, NO immigrants without a complete and stringent criminal background check. No more than 50,000 legal immigrants per year allowed entry to the U. S. period.

AR003511

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6m-a3qu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1802

Comment Submitted by Joanne Titus

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## Submitter Information

**Name:** Joanne Titus

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## General Comment

Please move to protect the safety of U.S. Citizens by addressing the immigration reforms put forth by President Trump.

AR003512

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-ikui
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1803

Comment Submitted by Pam Wilford

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## Submitter Information

**Name:** Pam Wilford

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## General Comment

Immigration laws need to change. We are not safe now and it will only get worse without President Trump's changes. I dont want my son and grandson to live in a country doesnt clear people coming in

AR003513



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-o1ra
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1804

Comment Submitted by Angel Alvarez

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## Submitter Information

**Name:** ANGEL ALVAREZ

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## General Comment

I love you President Trump! Please work with The President Trump and Drain the Swamp!

AR003514

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-6krm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1805

Comment Submitted by John hovis

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## Submitter Information

**Name:** John hovis

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## General Comment

How long does it take to vet a human from another country with out any paper work or medical records. They should not be allowed into the U.S.A without speaking English. We also dont need them bringing bad worms.

AR003515

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1806

Comment Submitted by Rona Brabant

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## Submitter Information

**Name:** Rona Brabant

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## General Comment

Please write your comment here.Remove this arbitrary beuracratic timeline. Now!!!! Do what is right for America first not the illegals.

AR003516

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1807

Comment Submitted by Mary Matta

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## Submitter Information

**Name:** Mary Matta

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## General Comment

The new border wall in Sunland Park is working. The Border Patrol officers are doing there job by shooting a gunman that shot on him first. They are protecting us first Americans. They also need to look into the town of Anapra for ISIS group. Build that Wall!! Thank you for focusing on border security.

AR003517

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-xknp
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1808

Comment Submitted by Kate Lewis

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## Submitter Information

**Name:** Kate Lewis

**Address:**

621 Alcatraz Ave  
Oakland, 94609

**Email:** katelewis44@gmail.com

**Phone:** 9254086517

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## General Comment

Asylum seekers arrive at our borders desperate for safety and eager to become contributing members of society. Among them are children, survivors of domestic violence, indigenous people, members of the LGBT community, religious and political minorities, people with disabilities, and many other deeply vulnerable people. Delay in receiving a work permit will further imperil their ability to support themselves and their families. It is also lost revenue for the government, which has the opportunity to tax their income. As of now, asylum seekers already wait 180 days to receive a work permit and be able to begin their lives as lawful members of our society. That wait should not be made longer.

AR003518

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6o-yirf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1809

Comment Submitted by Diana Negroponte

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## Submitter Information

**Name:** diana negroponte

**Address:**

3100 Cleveland Avenue, NW  
Washington, 20008

**Email:** negropod@gmail.com

**Phone:** 6466629299

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## General Comment

I support the arguments made to maintain the current timetable for EAD. Extension will result in further responsibility for the thousands of churches and civil society organizations which support men, women and families seeking asylum in our great country.

AR003519

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-cnzh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1810

Comment Submitted by Roy Hill

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## Submitter Information

**Name:** Roy Hill

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## General Comment

Build the wall, Upgrade our immigration Laws and secure Americas safety by removing this arbitrary bureaucratic timeline.

AR003520

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-pwso
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1811

Comment Submitted by Jasmin Tohidi

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## Submitter Information

**Name:** jasmin tohidi

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## General Comment

This is a bad proposal. The processing times allow the asylum seekers to become self sufficient especially in light of the fact that the Immigration Court and Asylum Office backlogs are outrageous. The better use of resources would be to hire more Immigration Judges and Asylum Officers. Additionally, USCIS processing times in general for EAD's has gone up exponentially and this will just add to that backlog.

AR003521



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-3grb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1812

Comment Submitted by Richard England

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## Submitter Information

**Name:** Richard England

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## General Comment

I want you to support Pres .Trumps immigration reforms !!

AR003522

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-2ftc
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1813

Comment Submitted by Robert Kellock

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## Submitter Information

**Name:** Robert Kellock

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## General Comment

The US immigration due process is ADMINISTERED by the Executive branch of government according to the LAWS passed by the Legislative branch. It is not subject to changes by the Judicial branch unless there is a Constitutional conflict. The 30 days in the law does not conflict with the Constitution.

AR003523

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6q-8ic7
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1814

Comment Submitted by AK Hundley

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## Submitter Information

**Name:** AK Hundley

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## General Comment

President Trump secure Americas safety by removing this arbitrary bureaucratic timeline. President Trump and Ken Cuccinelli secure Americas safety by submitting a comment NOW!

AR003524

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-rv2c
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1815

Comment Submitted by Scott Klein

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## Submitter Information

**Name:** Scott Klein

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## General Comment

When the security of our nation is at stake we must allow for proper identification of those who would be crossing our borders and entering the USA. We must know who is within our borders before they are allowed to enter.

AR003525

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-9khu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1816

Comment Submitted by Ehren Foss

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## Submitter Information

**Name:** Ehren Foss

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## General Comment

On September 9, 2019, DHS announced its plan to delete a regulatory provision stating that USCIS has 30 days from the date an asylum applicant files the initial EAD application to grant or deny that initial I-765. This proposal to delete the 30-day processing time will be devastating for our asylum seeking clients. The new policy will undermine the abilities of asylum seekers to sustain themselves and will allow DHS to have unlimited time to decide if and when asylum seekers will be issued work authorization. I oppose this policy.

DHS Docket No. USCIS-2018-0001

AR003526

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-kvnf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1817

Comment Submitted by Pamala Starks

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## Submitter Information

**Name:** Pamala Starks

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## General Comment

Our security is at risk!!Protect our boarders . I support Presidents Trump immigration reforms. Get something done up there in Washington

AR003527

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6p-1hl2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1818

Comment Submitted by Lureta Vokal

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## Submitter Information

**Name:** Lureta Vokal

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## General Comment

I respectfully request that you continue at the minimum a 30 day period for all immigrants to be fully vetted before being allowed to enter our country.

I do not understand why any American, regardless of political affiliation would not want immigrants fully vetted before entering our Great Country.

The immigrants entering our country illegally are not the same type of people who came to the US 200 or more years ago. The word terrorist was not one that our forefathers spoke or even heard of then.

If you are truly an American, you should be concerned about the future of our Country for our children and grandchildren.

AR003528

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-2nmz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1819

Comment Submitted by Donald Lynch

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## Submitter Information

**Name:** Donald Lynch

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## General Comment

Background checks on asylum seekers must not be rushed! We must filter out criminals and terrorists.

Please allow sufficient time for complete checks!

AR003529



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-s8vq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1820

Comment Submitted by Claire Pratt

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## Submitter Information

**Name:** Claire Pratt

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## General Comment

I am an immigration attorney and have represented asylum seekers.

Delaying or preventing asylum seekers from getting their work authorization (Employment Authorization Document or "EAD") approval can lead to:

Lost income to the asylum seeker and their family

Food insecurity

Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID.

Risk of homelessness/housing insecurity

Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify)

Vulnerability to exploitation, trafficking, and underground economy risks

Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income)

Loss of ability to support themselves and their families

Feelings of fear, desperation, and overall mental health concerns

If we want immigrants to take care of themselves, then we should give them permission to do so. If nothing else, consider the lost revenue to the U.S. USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

Let asylum seekers work!

AR003530

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6m-68ve
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1821

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am an immigration attorney who works with at risk populations. One of the number one concerns we see is individuals hoping to get work permission. Nearly everyone I have met simply wants to be able to provide for their families as best they can, and the ability to gain work authorization is essential for these individuals and their families.

USCIS has indicated that this delay in allowing asylum seekers to file I-765 applications will amount to lost compensation to asylum applicants ranging from \$255.88 million to \$774.76 million in taxable income per year. This is enormously significant to the families waiting for their claims to be processed.

This rule is also counter to U.S. financial interests--clearly the government receives tax benefits for all individuals who are able to receive taxable income. By cutting off this population and delaying their ability to get work permission, the U.S. government is working counter to its own interests.

This delay is part of a concerning, broad-based effort to make this process more difficult and more painful for asylum seekers to gain status. This agenda has nothing to do with U.S. security and safety or tax base and everything to do with making this process as painful as possible for those engaged in it, in order to deter people from trying to seek safe haven in the U.S.

If having more time to process these applications was truly the concern of USCIS, please allow asylum seekers to file their applications earlier in the process so that they may obtain working authorization.

AR003531

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-8psr
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1822

Comment Submitted by Floretta Guanciale

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## Submitter Information

**Name:** Floretta Guanciale

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## General Comment

President Trump needs your support on his Immigration Reform. It is time for you to back our President and do what is best for our country. Changing our Immigration laws is long overdue. Thank you.

AR003532

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1823

Comment Submitted by Kathryn Soderholm

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## Submitter Information

**Name:** Kathryn Soderholm

**Address:**

125 Chiswick Road

Brighton, MA, 021355312

**Email:** kathryn.soderholm@gmail.com

**Phone:** 7033808895

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## General Comment

Delaying work authorizations for asylum seekers is unnecessary and cruel. It will lead to reduced taxable income for the US government while simultaneously increasing the use of government resources. Furthermore, it is a security risk, as the delay in processing work authorizations would necessarily include a delay in processing background checks. If more time is needed to process the work authorizations, then asylum seekers should be permitted to request them after 120 days instead of the current 150, giving the government 60 days instead of 30 for processing while still finishing within 180 days.

AR003533

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1824

Comment Submitted by Elizabeth Chapin

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## Submitter Information

**Name:** Elizabeth Chapin

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## General Comment

I am in full support of President Trump's immigration reforms. Limiting the necessary time to complete background checks and get all pertinent information is contradictory to how the system should work. End these ridiculous timelines now!

AR003534

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1825

Comment Submitted by Nancy Huggins

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## Submitter Information

**Name:** Nancy Huggins

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## General Comment

I understand President Trump's Administration has only 30 days to check the background of Asylum seekers. This is insane. The House has done nothing for 3 years accept block our President in everything he says or tries to do. It's time you either go to work or get out.

AR003535

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6l-6e71
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1826

Comment Submitted by Eliana Nader

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## Submitter Information

**Name:** Eliana Nader

**Address:**

225 Friend Street  
Boston, ME, 02114

**Email:** ENader@magaletta.com

**Phone:** 6177230011

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## General Comment

The proposed rule change would benefit no one. The proposed rule change would hurt both asylum seekers, who would be unable to work to support their families, and the public at large. USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change.

The proposed rule change would harm children and families. Parents would be unable to work to support their families, causing food insecurity and homelessness. The proposed rule benefits nobody and harms many people, including the American taxpayer.

AR003536

# PUBLIC SUBMISSION

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**Comments Due:** November 08, 2019  
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1827

Comment Submitted by Ted Machin

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## Submitter Information

**Name:** ted machin

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## General Comment

QUIT LIEING TO US AND FIX OUR COUNTRY

AR003537



# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1828

Comment Submitted by Joe Wolfe

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## Submitter Information

**Name:** Joe Wolfe

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## General Comment

Support the President on immigration reform. We need to stop these criminals who seek asylum the wrong way. Secure our borders now.

AR003538

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-i393
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1829

Comment Submitted by Daniel Moline

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## Submitter Information

**Name:** Daniel Moline

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## General Comment

Asylum Seekers need to be investigated, background checked. We need to know how much money they have and what skills they have to offer our country. And most of all they should be able to speak dam good ENGLISH! If this takes longer than 30 days, so be it. Its time to fix our broken immigration system and protect U.S. Citizens.

AR003539

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1830

Comment Submitted by Stan McDonald

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## Submitter Information

**Name:** Stan McDonald

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## General Comment

I have a simple request, please support our President and his immigration reforms. This is a needed upgrade for this system to be efficient and effective. National security is a priority.

AR003540

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-h5nj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1831

Comment Submitted by Monica Vazquez

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## Submitter Information

**Name:** Monica Vazquez

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## General Comment

Stop jeopardizing our national security by punishing LEGAL immigrants for obeying our laws. They just want to keep them in place, all so they can keep our immigration system broken and undermine Donald Trumps presidency.

AR003541

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6n-jpol
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1832

Comment Submitted by Richard Wilson

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## Submitter Information

**Name:** Richard Wilson

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## General Comment

Please support our President's Immigration Reforms. National security is of utmost importance in our international climate. It is imperative to thoroughly screen every person.

AR003542

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-q9mj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1833

Comment Submitted by Annie Rice

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## Submitter Information

**Name:** Annie Rice

**Address:**

911 WASHINGTON AVE

Suite 211

SAINT LOUIS, MO, 63101

**Email:** annie.rice@kwlawstl.com

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## General Comment

Eliminating the 90 day adjudication requirement for pending adjustment applicants has had a dramatic effect on their livelihoods and ability to support themselves, their families, and contribute to our economy. Eliminating this 30 day rule for asylum seekers is not only cruel, it's completely contrary to good economics. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security. People need to work to live, to eat, to pay rent, to participate in our economy. They will find ways, and we will miss out on tax revenue and legal authorization. Financial stability is not a requirement for asylum, in fact, it's pretty counterintuitive. It also prevents them from having a valid Social Security Number, which will prevent them from having a valid ID, and thus blocking them from any sort of meaningful participation in the world. They won't be able to access above-the-board services, bank accounts, credit cards, driver's licenses (and therefore no insurance, which is dangerous for EVERY DRIVER ON THE ROAD), health insurance, etc. So telling them that the government will get to them when we get to them is just backwards, incredibly harmful thinking, both for these human beings and their lives, but also for the American people and our economy. This is nonsense. Please do not eliminate this 30 day requirement.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-

AR003543

seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR003544

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1834

Comment Submitted by Amanda Litton

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## Submitter Information

**Name:** amanda litton

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## General Comment

I SUPPORT MY PRESIDENT TRUMP!!!!!! 2020 4 MORE YEARS !!!!!!!

AR003545



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-r2tm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1835

Comment Submitted by Lana Myers

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## Submitter Information

**Name:** Lana Myers

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## General Comment

Please HELP out President,instead of putting up roadblocks at every corner!! He needs the FULL 30 days PER PERSON,to evaluate the status of the "immigrant".  
Haven't enough innocent AMERICANS died at the hands of violent,gun carrying (illegally),drunk drivers,etc...?????? Please allow enough time to properly vet these people.

AR003546

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1836

Comment Submitted by Paul Fitch

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## Submitter Information

**Name:** Paul Fitch

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## General Comment

It is imperative that we screen/vet immigrants/refugees thoroughly prior to their entry into our country. Thirty (30) days is often not sufficient time to so this. Information on each individual may not be readily accessible and therefore, I believe 90 days would be the bare minimum time limit on these types of screenings.

AR003547

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6j-j04h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1837

Comment Submitted by Frances Perry

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## Submitter Information

**Name:** Frances Perry

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## General Comment

Trump's immigration reform are for our protection. Give him the support for these reforms.

AR003548

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-3uxq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1838

Comment Submitted by Peter Reitz

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## Submitter Information

**Name:** PETER REITZ

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## General Comment

The timeline for verifying and vetting should be no shorter than 6 months to insure a full vetting of the asylum seeker

AR003549

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-ilem <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1839

Comment Submitted by Clark Grosvenor

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## Submitter Information

**Name:** Clark Grosvenor

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## General Comment

We need to thoroughly check every person.

AR003550

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-imb7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1840

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am a public defender in NYC who represents clients placed in immigration proceedings. As an immigration attorney, I can confidently say that this proposed regulation would be disastrous for many of my current and future clients. Asylum seekers experience unspeakable trauma in the countries they are fleeing from and the trauma continues once they come here and are placed in highly complex immigration proceedings. They are oftentimes incarcerated for many months before they get to tell a judge their story and why they deserve asylum in the U.S. One of the small victories our clients are able to claim is the ability to work while fighting their cases in immigration court. Being able to work allows our clients to have some semblance of a normal life: the ability to provide for themselves and their family. Delaying EADs for asylum seekers would further destabilize them, subjecting many to malnutrition, homelessness, the inability to get any sort of medical care, etc. This is one small protection we should all be safeguarding for this already-vulnerable population. I wholeheartedly oppose removing the 30-day requirement.

AR003551

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-8zt3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1841

Comment Submitted by Steve Burks

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## Submitter Information

**Name:** Steve Burks

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## General Comment

It is critical we secure our borders and protect our country from criminals and terrorists from countries that we cannot vet immigrants. Support the President.

AR003552

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1842

Comment Submitted by Christopher Elmore

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## Submitter Information

**Name:** Christopher Elmore

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## General Comment

The asylum law was created to protect individuals fleeing persecution and often death. These cases often take years for the US Government to adjudicate. Withholding employment authorization from asylum seekers is cruel to those with legitimate asylum claims. They often come to the US with little money and no resources due to their desperate need to flee for their safety. They must be allowed to work while waiting for their cases to be completed. The 30 day requirement to process the initial work authorization application is more than reasonable given the desperate need of the applicants. By the time they apply, they have already had to wait at least five months without the ability to work lawfully. The government has been able to meet the reasonable 30 day requirement in the past, there is not reason to change that now.

AR003553



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<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-vrs2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1843

Comment Submitted by Charlotte Nolte

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## Submitter Information

**Name:** Charlotte Nolte

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## General Comment

350 asylum seekers were sent to Maine because they wanted to wait here for their processing. They should have been vetted first. Im sorry for their situation but we have so many Americans that need help first.

AR003554

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-r9sj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1844

Comment Submitted by Mary Frank

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## Submitter Information

**Name:** Mary Frank

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## General Comment

The immigration system is broken. Why not try to fix it?? President Trump's reforms need to be passed. It isn't working now - why not try something new.

AR003555

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1845

Comment Submitted by Frank Moore

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## Submitter Information

**Name:** Frank Moore

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## General Comment

Have an unlimited waiting period so many will. hopefully, give up and go back to where they came from, especially those from the Middle East.

AR003556

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-s2z8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1846

Comment Submitted by Sherry Norquist

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## Submitter Information

**Name:** Sherry norquist

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## General Comment

Do your job and support immigration reform!! Its not our responsibility to give a thing to illegals !!

AR003557

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-g6ev
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1847

Comment Submitted by Cheri Attix

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## Submitter Information

**Name:** Cheri Attix

**Address:**

2221 Camino del Rio S, Suite 201

San Diego, CA, 92108

**Email:** Cheriattix@icloud.com

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## General Comment

I am an immigration attorney and I have been representing asylum applicants for over 20 years. Many asylum applicants arrive in the United States without any support system and have to work to survive. Even the current 180-day wait (which in practice often stretches beyond that due to processing delays) is very difficult for them. They end up reliant on charity and, in some cases, actually become homeless waiting to be granted the right to work. I once represented a man who was forced to sleep in a doorway the night before his asylum hearing in immigration court. He was unable to work because the 180-day period had not yet run. I don't know what would have happened to him if the judge had not granted his asylum claim that day. I am not unsympathetic to USCIS's workload. We are all overloaded right now. But, this proposed rule would punish law abiding bona fide refugees who only ask for the right to support themselves while their cases are pending.

I have watched the entire asylum system deteriorate since applications from Central America started to spike in 2012. Instead of responding appropriately and requesting more funding to hire and train more asylum officers, USCIS did nothing and allowed the cases to expand into the current backlog. In Southern California the wait for an interview at the asylum office is six years and growing for those who applied between 2013 and 2017. It is the never-ending backlog of I-589s, that is has created the high numbers of I-765 applications in the (c)(8) category. The asylum program used to be the most efficient in all of USCIS, but inappropriate inaction destroyed it and we are all living with the consequences. Don't punish people who are just asking for the US to save their lives. Some suggestions:

1. Seek more funding for adjudicators and hire as many as you can.
2. Increase the validity of (c)(8) EADs from two years to five.
3. Create a new document for those granted asylum that clearly states on its face that the asylee is authorized to

AR003558

work in the United States without restrictions. Done properly, this would eliminate the entire (a)(5) product line and free up adjudicators to work on (c)(8)s

AR003559

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1848

Comment Submitted by Cristina Dos Santos

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## Submitter Information

**Name:** Cristina Dos Santos

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## General Comment

My name is Cristina dos Santos. I am a managing attorney on the Immigration Program at Community Legal Services in East Palo Alto. I have been working with asylum seekers for over a decade. The asylum seekers we represent desperately need work authorization in order to survive. Many of them are single mothers with young children. All have suffered trauma and faced great danger to seek refuge in the United States. Asylum seekers who are unable to work often face homelessness, hunger, and exploitation. This is true also of their children. The proposed change would create extreme hardship for the most vulnerable families in our community. It is heartless and cruel.

AR003560

# PUBLIC SUBMISSION

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<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1849

Comment Submitted by Frances Hartmann

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## Submitter Information

**Name:** Frances Hartmann

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## General Comment

Removing the 30-day deadline would hurt asylum seekers and the U.S. economy. I work with asylum seekers on a daily basis. Once securing their personal safety in the United States, the most important thing for most asylum seekers is to find employment and establish economic security. The timely issuance of employment authorization allows asylum seekers to secure stable employment, which is necessary to secure valid identification.

If USCIS is not able to process EAD applications in the 30-day timeframe, then the agency could allow applicants to file before the current 150-day restriction, giving USCIS more time to process applications without delaying or harming asylum seekers. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR003561



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-rag3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1850

Comment Submitted by Carmen Rodriguez-Arroyo

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## Submitter Information

**Name:** Carmen Rodriguez-Arroyo

**Address:**

910 Sheridan Ave.

Apt 1L

Bronx, NY, 10451

**Email:** carmen.rodriaguezarroyo@upr.edu

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## General Comment

Accountability is important. If an agency is meeting current deadline requirements, there is no reason those requirements should be eliminated. The 30 day mark should stay in place so that those who rely on timely adjudications can hold the agency accountable when/if the agency fails. The government cannot be allowed to eliminate the rules and take remedies away from those who want to come to this country to work and pay taxes. Why would an agency want to take power away from the people to make this country prosper? This rule change would work \*against\* the best interest of americans everywhere.

AR003562

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-j7ye
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1851

Comment Submitted by Dennis Hockenberry

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## Submitter Information

**Name:** DENNIS hOCKENBERRY

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## General Comment

tHE pRESIDENT IS TRYING AND WORKING SO HARD TO KEEP aMERICA SAFE, WHILE THE cEMACRAT'S ARE DOING EVERY THING THEY CAN TO DESTROY IT. i ASK THAT THE PEOPLE IN wASHINGTON WILL BACK AND HELP pRESIDENT TRUMP KEEP aMERICA SAFE IN gOD'S NAME i PRAY.

AR003563

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-n1uk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1852

Comment Submitted by Anayancy Housman

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## Submitter Information

**Name:** Anayancy Housman

**Address:**

453 Westminster Avenue

Elizabeth, 07208

**Email:** anayancy@anayancy-housman.com

**Phone:** 9085278622

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## General Comment

Do not eliminate the 30 day processing time for work permit for asylum applicants. They need this work permit to provide for themselves their families. There is no reason to prolong a benefit for which they already qualify.

AR003564

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1853

Comment Submitted by Alison Griffith

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## Submitter Information

**Name:** Alison Griffith

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## General Comment

As an immigration lawyer, I have the distinct privilege to represent asylum seekers. My clients are human rights defenders, advocates for the rule of law, and other individuals fleeing human rights abuses. They contribute to the U.S. economy and are here in the U.S. to find safety and become part of our community. They deserve the opportunity to work to support their families. Too many struggle to survive while awaiting their work permits for many months after they file their initial asylum applications, after fleeing for their lives with only the shirt on their backs.

Asylum seekers today face long backlogs in asylum processing, often waiting years after filing the asylum application for an interview and, even later, a decision. Asylum seekers are often vulnerable, with medical and mental health needs due to their trauma and persecution. Generally excluded from public assistance, asylum seekers must work to provide food, clothing, shelter, and other basic needs for themselves and their families. Asylum seekers who were forced to leave spouses and children behind must save thousands of dollars to pay for travel expenses. Without employment authorization, asylum seekers are dependent on individual and other private charity.

Indefinitely blocking asylum seekers ability to support themselves and their families is an abuse of discretion and an attempt to further deter people from seeking asylum in the United States. The proposed rule comes on top of extreme adjudication delays by USCIS across all types of cases and recent changes in USCIS customer service procedures which make it nearly impossible to follow up on pending cases.

In addition, the proposed rule is part of a pattern of animus towards the right to seek asylum this administration has shown. The justifications contained in the proposed rule are veiled attempts to justify what is an attack on the rights of asylum seekers and a pattern of practice by this administration aimed at breaking the asylum system.

The Administration attempts to justify the proposed rule on the basis of national security and vetting concerns and on administrative efficiency interests. In terms of administrative efficiency, the proposed rule notes the

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burden that has resulted from shifting staff to timely process EAD applications in compliance with Rosario v. USCIS and claims there will be a cost saving by eliminating the timeline. However, it notes USCIS could hire more officers, but has not estimated the costs of this and therefore has not estimated the hiring costs that might be avoided if this proposed rule were adopted.

The proposal also cites vague security concerns which the federal court in Rosario found to be sufficiently low to order USCIS to comply with the 30-day processing deadline. Any need for additional vetting prior to issuance of employment authorization could be addressed by less draconian means than simply eliminating the processing parameters for all applicants.

The Universal Declaration of Human Rights enshrines the right to seek and enjoy asylum from persecution. The United States has committed to that principle through the International Convention on Civil and Political Rights, the Refugee Convention and Protocol, and the Convention Against Torture. This right has been codified in federal law. Without access to a means of basic support during the asylum process, the United States weakens its commitment to this fundamental human right.

The asylum seekers with whom I have had the privilege to work are brave survivors of human rights abuses. The United States has turned its back on refugees in the past, including during World War II, with devastating consequences. Further delaying issuance of work permits to asylum seekers constitutes inhumane treatment of asylum seekers who already struggle to survive without any access to public benefits or work authorization until six months after their applications are filed.

AR003566

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-7f8f
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1854

Comment Submitted by Randall Kessinger

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## Submitter Information

**Name:** Randall Kessinger

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## General Comment

Trump has done so much FOR our country and the demoncrats keep doing things TO our country !

AR003567

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6i-4j2f <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1855

Comment Submitted by Satsita Muradova

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## Submitter Information

**Name:** Satsita Muradova

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## General Comment

Please do not eliminate the 30-day processing regulation for initial asylum EADs. Asylum applicants are the most vulnerable individuals who left everything behind in fear of being persecuted. They have no means to support themselves unless they can work. Timely issuance of employment authorization would insure that they can provide for themselves and their families and also have a form of government ID.

AR003568

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-nfuy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1856

Comment Submitted by Norman Chapman

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## Submitter Information

**Name:** Norman Chapman

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## General Comment

Would you dread lock loving pricks please support President Trump's immigration reforms. Or would you sorry whelps rather more innocent Americans be murdered by illegal invaders who are running rampant around our country. When it does happen again I hope it is you or your family members!

AR003569



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-fx0j <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1857

Comment Submitted by Fredda Hodge

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## Submitter Information

**Name:** Fredda Hodge

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## General Comment

Follow the lead of our President. He has already done more for our country than any other President. So stop trying to keep him from doing the wonderful job he has accomplished so far with the House doing absolutely nothing for the good of the United States of America. Shame on you Congress I always thought Congress was where we the people went when we needed help. You do nothing to help the country only do every thing you can to tear it apart and give our Country over to China and the UN.

AR003570

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-o67l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1858

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am an immigration attorney and many of my clients are asylum applicants. USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security. This restriction is bad for asylum seekers and the American economy, as well.

AR003571

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-k3ml <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1859

Comment Submitted by Beverly Fenton

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## Submitter Information

**Name:** Beverly Fenton

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## General Comment

We must STOP illegal immigration. They must be vetted properly. We have already seen the killing that has happened of innocent lae abiding Americans without this process. We Americans get NO justice.

AR003572

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-acf6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1860

Comment Submitted by Sharon Golden

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## Submitter Information

**Name:** Sharon Golden

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## General Comment

Help President Trump secure Americas safety by removing this arbitrary bureaucratic timeline.

AR003573

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-b3k1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1861

Comment Submitted by Gabriel Martinez

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## Submitter Information

**Name:** Gabriel Martinez

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## General Comment

Get These DEMONRATS MONSTERS OUT Of The U.S. Period!

AR003574

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-vhz9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1862

Comment Submitted by N Said

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## Submitter Information

**Name:** N Said

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## General Comment

Six months was a long wait for a family seeking refuge to wait on a work permit anyway but I understand that there is a process to the program. However, delaying the work permits even further is only punitive and has not bearing on the national security of the country or impact on wages for the working class. If anything, it encourages people to work illegally.

It makes sense for the government to issue timely work permits to (1) know who is in the country and (2) tax people accordingly. The country will lose valuable taxable income ranging from \$255.88 million to \$774.76 million if work permits are not processed timely.

Also, you will hurt vulnerable families. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks.

USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

AR003575

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-gt04 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1863

Comment Submitted by Donna Power

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## Submitter Information

**Name:** Donna Power

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## General Comment

Support the safety of all Americans by supporting Pres. Trump's immigration reform. It is your duty to protect Americans.

AR003576

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-scd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1864

Comment Submitted by Gayle Schmidt

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## Submitter Information

**Name:** Gayle Schmidt

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## General Comment

We NEED immigration reform!! Please support President Trump's reforms.

Thank you

AR003577



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-zvp3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1865

Comment Submitted by Eric Naquin

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## Submitter Information

**Name:** Eric Naquin

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## General Comment

Please support Trump and his immigration policies.

AR003578

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1866

Comment Submitted by Anonymous Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Those coming to our country seeking asylum deserve a humane existence while we adjudicate their claims. They should be able to support themselves and their families and can contribute meaningfully to our economy and society, if permitted to work. 30 days is a rational and reasonable period for processing of work authorization, and any change to that is an implicit invitation to the agency to delay in order to punish and deter asylum seekers. That is fundamentally unfair and harmful to both asylum seekers and the community at large. I oppose this regulation.

AR003579

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-hux2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1867

Comment Submitted by Russell Reahard

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## Submitter Information

**Name:** Russell Reahard

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## General Comment

Dear sir/madam:

Please support PRESIDENT TRUMPs immigration reforms, and give enough time to vet each immigrant seeking asylum.

Keep America Safe, for goodness sake!!

AR003580

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-v82i <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1868

Comment Submitted by Patricia Bolt

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## Submitter Information

**Name:** Patricia Bolt

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## General Comment

Support our president , Help keep our country safe!

AR003581

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-4nsb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1869

Comment Submitted by Amy Pedagno

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## Submitter Information

**Name:** Amy Pedagno

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## General Comment

As any attorney who works with asylum seekers daily, removal of the 30 day processing provision for asylum applicant's EADs is a terrible idea. The government has made it clear that they do not want immigrants becoming a burden on the US social welfare program. Delaying the length of time before applicants are legally eligible to work only increases the burden on charitable institutions and welfare programs.

The asylum seekers I work with have a huge desire to stand on their own two feet. They frequently held white-collar positions in their home countries and are willing and able to become productive members of the US economy.

It is not asylum seekers' fault that USCIS is so backlogged. I can't think of a single client who doesn't want their case adjudicated in less than 180 days. But since that is simply not feasible at this time, punishing asylum seekers because of the government's own delays simply demonstrates a clear animus towards asylum seekers and not any vested interest in facilitating the immigration process.

AR003582

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1870

Comment Submitted by Steve Holland

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## Submitter Information

**Name:** steve holland

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## General Comment

It is ridiculous that everything needed the dems are against now that we have a TRUE LEADER. We the people of the USA should be able to hold those accountable for their espionage type affairs against not only Pres. Trump but also those who know right from wrong and stand for right. I ask you 1 question if you believe in GOD what will you say was the reason for your wrong doings when standing at the JUDGEMENT SEAT before GOD? You are assisting in making this upcoming group who will lead one day to believe correctness matters not. I am not spot free but I learned and corrected my bad behaviors and believe me the wrong decisions you make when you know they are wrong WILL haunt you in your alone time one day!

AR003583

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1871

Comment Submitted by Keaton Whitten

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## Submitter Information

**Name:** Keaton Whitten

**Address:**

14900 Interurban Ave S, Ste 271  
Seattle, 98168

**Email:** keaton@khwimmigration.com

**Phone:** 206.402.5695

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## General Comment

It is imperative that employment authorization applications for asylum seekers are processed in 30 days, and not longer. Asylum seekers are among the most vulnerable in our community, and are often fully reliant on friends, family, community members, church members, and social service providers to ensure their basic needs are met, UNTIL they are able to gainfully seek employment. Asylum seekers must already wait 180 days from filing their asylum application before applying for work authorization. Adding any further delays only increases their risk of homelessness and need. The government should consider shortening the 180 day wait period before adding delay to the 30 day processing time.

AR003584

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<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-9mmu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1872

Comment Submitted by Mary Hover

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## Submitter Information

**Name:** Mary Hover

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## General Comment

Please keep our country safe and check all asylum seekers. Take the necessary time upfront and keep people out that want to do harm to America. Check and double check. Dont fall for the weak link in the process

AR003585



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6l-ica8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1873

Comment Submitted by Patricia Benavides

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## Submitter Information

**Name:** Patricia Benavides

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## General Comment

Please support President Trumps immigration reforms. We need to thoroughly check background of every asylum seeker. Keep America safe. Where are tax dollars going.. you work for the American people right.

AR003586

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-f445
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1874

Comment Submitted by Dennis Stover

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## Submitter Information

**Name:** dennis stover

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## General Comment

We need you to take action and support President Trump with his Immigration reforms. We the people should be protected from these drug cartels murdering our citizens.

AR003587

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6i-2wi8 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1875

Comment Submitted by Richard Samuelson

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## Submitter Information

**Name:** Richard Samuelson

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## General Comment

Thorough vetting of all aliens is imperative.

AR003588

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-it0y
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1876

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Taking in Asylum seekers is a part of what makes America the greatest country in the world. If you take this action you will only be furthering the demise of the US as a respectable country who stands in solidarity with the oppressed people around the globe. All the racist people blaming black and brown people for their own plight are misguided and ignorant. Our laws shouldnt reflect that ignorance.

AR003589

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Tracking No.</b> 1k3-9d6j-vxf8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1877

Comment Submitted by Hollie Davis Frick

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## Submitter Information

**Name:** Hollie Davis Frick

**Address:** United States,

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## General Comment

The United States was founded on the principle of freedom. We have always welcomed immigrants fleeing persecution for a variety reasons, including religion, extreme violence, etc. "The American Dream" is to come to the United States, WORK HARD, make yourself a success, and take care of your loved ones. Asylum seekers are here for the right reasons and doing it legally. Delaying the amount of time it takes to get valid work authorization not only makes the American dream harder to achieve, it puts undue hardship on people who are already here wanting to work for what they get and to support their families and communities.

USCIS processing times are at an all time high, not because of case volume but because of inefficiency and lack and desire to treat immigrants like human beings. By removing the 30-day rule, asylum applicants will likely have to wait well over six months to be able to work lawfully and support themselves and their families. This policy change helps no one but USCIS. It prevents U.S. employers from hiring people who are qualified and willing to work, often in jobs U.S. workers don't want to do. It makes the lives of these asylum seekers even harder than they already are. The United States is better than that.

AR003590

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-obsf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1878

Comment Submitted by Steffani Powell

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## Submitter Information

**Name:** Steffani Powell

**Address:**

1825 Lakehurst Dr SE

Olympia, WA, 98501

**Email:** steffanipowell@hotmail.com

**Phone:** 3609512031

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## General Comment

Asylum seekers are some of the most vulnerable people you will meet. After leaving their family members, community, culture, and, in many cases, the only life they have ever known, they must seek security and safety in an unknown country. Our asylum system is a wreck and while we undergo the painful necessity of reorganizing, folks waiting for their asylum hearings will need to work. I would prefer not to entertain arguments that immigrants are a stress on our government and community resources when at the same time we do not permit them to work for longer and longer periods of time. Asylum seekers should receive work permits at the earliest possible moment so that they can support themselves - to the best of their ability - while waiting for their final hearing.

AR003591

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-121l
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1879

Comment Submitted by Kellen Powell

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## Submitter Information

**Name:** Kellen Powell

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## General Comment

How exactly are asylum seekers supposed to assimilate if they cannot work? How are asylum seekers supposed to support themselves if they cant work? Havent asylum seekers been through enough? It is hard to see the justification for this rule while the government reduces the number of asylum seekers it allows in every year. If an asylum seekers cannot work they will become a burden on society and may fall into a trap of needing to violate the immigration laws to work or violate the law by engaging in criminal activity to support themselves. If you give people a lawful and moral way to make money they will take it, even if it is less than they would make committing criminals acts or immoral behavior. If you doubt me then you must not have learned the lesson from the Iraq War, when we gave money to poor people to stop committing terrorism or helping insurgents and they did.

AR003592

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-1702
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1880

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Allow asylum seekers to work and prove that they can stand on their own two feet. If they can, then they're an asset to this country and should be allowed to stay. It is silly that it takes the government as long as 30 days to issue a work permit - one week should be more than enough time to figure out whether a person is eligible and push the "create" button. Also, stop the hypocrisy of telling people that they have to be able to "stand on their own two feet", but then at the same time affirmatively taking steps to prohibit them from doing so. There is absolutely no legitimate reason that the government needs more than 30 days to create work authorization.

AR003593



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-7v22
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1881

Comment Submitted by Pat Sharkey

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## Submitter Information

**Name:** pat sharkey

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## General Comment

What is the point of shortening the time when to do a good and thorough job is required....and there are thousands of them....who is to benefit from this????? Not the average American that is for sure!

AR003594

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-ojm7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1882

Comment Submitted by Hayley Upshaw

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## Submitter Information

**Name:** Hayley Upshaw

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## General Comment

People who are fleeing violence and seeking asylum status must have the ability to work in order to support themselves and their families throughout the application process. These individuals have already been through trauma and displacement. Work is a necessity both to meet their physical needs for housing, food, and necessities as well as mental needs to establish community in a new land. Delaying work permits for eligible people will only force more individuals, families and children into extreme poverty and isolation, and will rob the public of the benefit of their skills and knowledge. This is a shortsighted, discriminatory plan and should be rejected.

AR003595

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-nsrb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1883

Comment Submitted by Linda Norris-Clifford

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## Submitter Information

**Name:** Linda Norris-Clifford

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## General Comment

I support Trump! In all matters and not the socialist left!

AR003596

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-u1r2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1884

Comment Submitted by Mark Abbott

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## Submitter Information

**Name:** Mark Abbott

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## General Comment

Please do not hurt the legal immigrants!

AR003597

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-u02r
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1885

Comment Submitted by Brenda Spencer

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## Submitter Information

**Name:** Brenda Spencer

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## General Comment

Please help President Trump to do the right thing by abiding by his Immigration Reforms. He is only trying to keep American People safe! I am behind him all the way and he needs the time to do this the right way!

AR003598

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-wzgt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1886

Comment Submitted by Donald Smith

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## Submitter Information

**Name:** Donald Smith

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## General Comment

Dear Senators, and Representative,

President Trump is trying to reform our immigration process to protect America from terrorists, and illegals. You swore an oath to do the same.

Start earning your pay, and get this done. We the citizens of this nation, are tired of sending you to Washington to betray us. Now for once in your career, do something right, and get this invasion stopped

AR003599

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-cfdl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1887

Comment Submitted by Janet Fetherman

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## Submitter Information

**Name:** Janet Fetherman

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## General Comment

Please support President Trump's immigration reform. Here in Tucson the crime keeps going up due to our unsecured borders. It won't be long before Tucson is as unsafe as it is on the the other side of the boarder.

AR003600

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-ym0e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1888

Comment Submitted by Harry Batzel

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## Submitter Information

**Name:** HARRY BATZEL

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## General Comment

With the increased number of asylum seekers, both legitimate and not 30 days to check their backgrounds is ridiculous. Why are so many in the government so unconcerned with our security. It is past time to do something to reform the broken immigration system before it is too late!

AR003601



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-kbm7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1889

Comment Submitted by Nora Christiani

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## Submitter Information

**Name:** Nora Christiani

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## General Comment

I work for a legal services organization where I advocate alongside non-citizens in detention and deportation proceedings, many of whom are asylum-seekers. The ability to work in the U.S. with a work permit while waiting for the adjudication of their asylum claims fundamentally changes the lives of asylum seekers. The right to seek asylum is a basic human right, enshrined in international law at Article 14 of the Universal Declaration of Human Rights. USCIS and the Trump administration are now attacking the fundamental right to seek asylum in myriad ways. The proposed change to the 30-day processing provision is yet another example of the cruel policies set forth by this administration to deter asylum seekers -- individuals exercising their human rights -- and an attempt to marginalize these individuals. As someone who works with asylum seekers, I am deeply concerned about what this rule could mean for people seeking asylum, as well as the children of asylum seekers who depend on the adults in their lives to provide for them.

AR003602

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-3f84
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1890

Comment Submitted by Bert Walker

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## Submitter Information

**Name:** BERT WALKER

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## General Comment

Its true! Instead of giving the Trump Administration enough time to thoroughly check the background of every asylum seeker, theyre being forced to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline.

Thankfully President Trump is fighting to undo this nonsense. But the radical Left is pushing back and the comment period closes FRIDAY!

They dont care that these radical restrictions jeopardize our national security or that they punish LEGAL immigrants for obeying our laws. They just want to keep them in place, all so they can keep our immigration system broken and undermine Donald Trumps presidency.

Get off your a\$\$ DC and help President Trump secure Americas safety by removing this arbitrary bureaucratic timeline.

AR003603

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-wvkj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1891

Comment Submitted by Daniel Sullivan

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## Submitter Information

**Name:** Daniel Sullivan

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## General Comment

Our country is less safe today because of arbitrary bureaucratic timelines.

Its true! Instead of giving the Trump Administration enough time to thoroughly check the background of every asylum seeker, theyre being forced to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline.

Please help President Trump and Ken Cuccinelli secure Americas safety NOW!

Thankfully President Trump is fighting to undo this nonsense.

AR003604

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-x91e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1892

Comment Submitted by James Strosnider

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## Submitter Information

**Name:** James Strosnider

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## General Comment

Do Your job and follow President Trump's Lead. Only properly vetted people should be allowed to enter the United States. Let the government of the countries that these people are fleeing take care of there own.

AR003605

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-1xsj <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1893

Comment Submitted by Barbara Holtz

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## Submitter Information

**Name:** Barbara Holtz

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## General Comment

Instead of giving the Trump Administration enough time to thoroughly check the background of every asylum seeker, they're being forced to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline. President Trump is doing a fantastic job at protecting this country and making it economically great. Stop screwing over this country because of politics!

AR003606

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-ff37
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1894

Comment Submitted by Anna Lovato

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## Submitter Information

**Name:** Anna Lovato

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## General Comment

Our country has been successful because of the rule of law, that is, because of respect for the rule of law. Please support the president's reforms, or support enforcement of the current laws until congress takes the time to write and pass new immigration legislation.

AR003607

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-utvt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1895

Comment Submitted by Teresa Statler

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## Submitter Information

**Name:** Teresa Statler

**Address:**

P.O. Box 12082

Portland, 97212

**Email:** tstatler@easystreet.net

**Phone:** 5032204185

**Fax:** 5032001398

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## General Comment

I am an immigration lawyer who has been representing asylum seekers for more than 27 years. It is difficult enough that asylum seekers must wait 150 days after filing their applications to apply for an employment authorization document (EAD). They are already the most vulnerable non-citizens here. And, they are the most deserving of our care, attention, and sensitivity to what they have suffered. Making them wait even longer than 180 days is nothing short of mean and inhumane. They need to work--to support their families, to get back to some sort normal life--after suffering harm, torture and persecution. Surely, the government can adjudicate within the 150-180 day period (30 days) these deserving individuals' simple requests to work. I have personally seen the struggles asylum-seekers face when they have to wait the 150 days to be employed. They live in poverty and/or very reduced circumstances, or are forced to rely on family and friends. Allowing them to be employed in a timely manner is just the humane --and right--thing to do.

AR003608

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-dtm7 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1896

Comment Submitted by Gary Case

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## Submitter Information

**Name:** gary case

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## General Comment

Please support our PRESIDENT TRUMP !!! GOD BLESS !!!

AR003609



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-tevb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1897

Comment Submitted by Suzanne Slocum

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## Submitter Information

**Name:** Suzanne Slocum

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## General Comment

Please write your comment here.

Please do not limit the time to do a complete background check on all trying to enter the country as an illegal/asylum seeker. No time constrictions so the thorough job can be done.

AR003610

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-svw1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1898

Comment Submitted by Domenic Tedeschi

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## Submitter Information

**Name:** Domenic Tedeschi

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## General Comment

Please support Trump our border is not safe.

AR003611

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-6gcj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1899

Comment Submitted by Cary Kovacik

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## Submitter Information

**Name:** Cary Kovacik

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## General Comment

I see the need so clearly. I expect you to Support President Trump's Immigration Reforms.  
I trust My President!!!

AR003612

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-df3o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1900

Comment Submitted by Ray Torres

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## Submitter Information

**Name:** Ray Torres

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## General Comment

Dear. Oficial.

Please help president Trump do his job.

AR003613

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-y9bx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1901

Comment Submitted by Joseph Parriott

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## Submitter Information

**Name:** JOSEPH PARRIOTT

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## General Comment

SHUT DOWN ILLEGAL EMIGRATION NOW!! BUILD THE WALL AND SECURE A MORE SAFE AMERICA.

AR003614

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-o6vw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1902

Comment Submitted by Kira Gagarin

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## Submitter Information

**Name:** Kira Gagarin

**Address:**

150 Speen Street

201

Framingham, MA, 01701

**Email:** kira@gagarinlaw.com

**Phone:** 5084554241

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## General Comment

Asylum seekers are especially vulnerable in our community and need the ability to work. This requires adjudication of their EAD in a timely manner. They cannot wait months on end to be able to provide for themselves and family. This delay will also be a burden on the US Government and organizations as the asylum seeker will need more assistance due to not being able to support themselves. Asylum interviews are taking years to schedule and people cannot languish during that time without being able to work. They also need identification and drivers licenses, which they would not be able to obtain without the EAD. It is already hard enough to be an asylum seeker. This would make that population ever more vulnerable and expose them to homelessness, exploitation, trafficking, and other hardships. The EAD should be issued in the 30 days.

AR003615

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-hph1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1903

Comment Submitted by Dorothy Davis

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## Submitter Information

**Name:** Dorothy Davis

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## General Comment

Re: Ridiculous Timeline for Background Checks of Asylum Seekers

Please help President Trump secure America's safety by removing the arbitrary bureaucratic timeline which gives little to no time to vet asylum seekers.

AR003616

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1904

Comment Submitted by Kathryn Reilly

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## Submitter Information

**Name:** Kathryn Reilly

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## General Comment

President Trump is the only president who has actually tells it like it is. Plain speaker. This is who we need to lead America. Americans do not want criminals allowed in our country. What's so hard to understand? So many citizens have been harmed or murdered by these illegals. My grandmother was sponsored so as not to be a burden!

AR003617



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1905

Comment Submitted by Richard Weed

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## Submitter Information

**Name:** Richard Weed

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## General Comment

Please support President Trump's Immigration Reforms which will help to keep our country safe. Especially now with the cartels are killing Americans to get there drugs across our borders it is imperative to keep our borders safe.

AR003618

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-80iw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1906

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This proposal would harm asylum seekers and our local communities. First, asylum seekers would lose income and the ability to support themselves. This in turn causes homelessness, and dependence on the government. Without a valid work permit and social security card, asylum seekers have difficulty in obtain health insurance, which again forces them to seek government assistance or go to public hospitals. In the state of Nevada, their ability to secure a driver's license would be stymied. Instead they would get a privilege card which leads to more fees and racial profiling. In turn, the inability to support oneself and their families, leads to anxiety and depression and mental health concerns. If these families have children, they are unable to provide them with a stable home and safe environment which affects their overall health.

A better solution would be to allow the asylum applicant to file earlier than the 150 days if USCIS is taking longer than 30 days to adjudicate the application.

AR003619

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-yh61
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1907

Comment Submitted by Lawrence Jennings

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## Submitter Information

**Name:** Lawrence Jennings

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## General Comment

With the ambush and brutal murder of a group of American woman and children in Mexico just a couple days ago, I am more concerned then ever that not enough is being done to keep our southern border secure. The vetting process for those who cross the border must be through, and should definitely be more than 30 days! !

AR003620

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-c4q4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1908

Comment Submitted by Regina Kot

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## Submitter Information

**Name:** Regina Kot

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## General Comment

Please support President Trump on this very important matter.

AR003621

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-lwzc <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1909

Comment Submitted by Billye Brockmeier

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## Submitter Information

**Name:** Billye Brockmeier

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## General Comment

The timeline needs to be removed now, so illegal immigrants can be properly checked before entering our great country.

AR003622

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-q5ur <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1910

Comment Submitted by Rachel Anonymous

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## Submitter Information

**Name:** Rachel Anonymous

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## General Comment

The speedy issuance of work authorization documents helps asylum seekers to become self sufficient and pay for legal counsel while they wait for their court date. To deny asylum applicants this benefit in a timely manner frustrates our obligation to protect the vulnerable people coming to our borders asking for protection.

AR003623

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1911

Comment Submitted by Steve Sunderland

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## Submitter Information

**Name:** Steve Sunderland

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## General Comment

Everyone in the United States that is an American patriot wants a safe country not an unsafe country. Please do not to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline. Do the right thing.

AR003624

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-6i9q
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1912

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The US should welcome refugees who are fleeing persecution in their country. Refugees fleeing persecution usually do not come with funds to settle in a new country and support themselves for over 6 months without needing to work. They are not seeking to be a burden on society, but to work legally to support themselves while their case is pending. The issuance of the employment authorization is already delayed by law, and it is imperative that asylum applicants receive employment authorization as soon as possible under the law. Refusing employment authorization may force some people to work unlawfully in situations in which they may be vulnerable to further exploitation.

AR003625



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1913

Comment Submitted by Joseph Curatolo

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## Submitter Information

**Name:** Joseph Curatolo

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## General Comment

Please change your restrictive policy in regard to a 30 day timeline to review potential immigrants into this country. The administration needs sufficient time to properly vet the people who are flooding into this country

We also need to allocate sufficient funds to complete the border wall and protect our borders.

AR003626

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1914

Comment Submitted by Kyle Edgerton

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## Submitter Information

**Name:** Kyle Edgerton

**Address:**

P.O. Box 21493

Reno, 89515-1493

**Email:** info@edgertonlegal.com

**Phone:** 7759003343

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## General Comment

My name is Kyle E. Edgerton, and I am an immigration practitioner in Reno, Nevada. I have ten years of experience in the immigration field, and I know how difficult it is for noncitizens to prove their eligibility for immigration benefits without a reliable source of income. The Proposed Rule would make it more difficult for asylum seekers -- among the most vulnerable noncitizens served by our immigration system -- to secure lawful employment and present the strongest cases possible.

Asylum seekers use employment authorization to support themselves and their dependents and to secure legal representation to prove the merits of their cases. According to DHS's own data, asylum seekers collectively earn hundreds of millions of dollars annually that allows them to meet those needs while filling undesirable roles in the workforce, paying taxes at all levels of government, and stimulating growth throughout the economy. The Proposed Rule would repeal protections for asylum seekers to have their applications for employment authorization processed in a timely way, jeopardizing this multi-pronged economic stimulus.

The Proposed Rule is another shameful example of this administration's inhumane and self-defeating immigration policies. The same administration that would require some noncitizens to prove their ability to purchase health insurance coverage and live independently of public assistance also seeks to burden other noncitizens' capacity to earn income. This illogic extends to the administration's purported national security concerns animating this Proposed Rule. Virtually all asylum-based applications for employment authorization are already being processed within the 30-day timeframe without any demonstrable burden on DHS.

Even if DHS could establish an actual need for additional processing time -- a showing it has failed to make in

AR003627

the Proposed Rule -- it has not made a compelling case against the obvious alternative. Currently asylum-seekers cannot submit an application for employment authorization until their asylum applications have been pending for 150 days. When the 30-day processing time is included, asylum seekers must wait 180 days from the date of requesting asylum before receiving employment authorization. DHS could afford itself additional processing time by accepting asylum seekers' applications for employment authorization earlier (e.g., 90 or 120 days after filing for asylum); as a practical matter, asylum seekers would continue to receive employment authorization 180 days after filing for asylum.

The Proposed Rule lacks an adequate factual foundation or an internally coherent policy objective. It should be rejected because the current regime appropriately balances the security and humanitarian concerns presented by asylum seekers' need for employment authorization. Alternatively, a new Proposed Rule should be published that combines extended processing time with an earlier submission date for applications for employment authorization.

AR003628

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<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-w2vy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1915

Comment Submitted by Linda Billings

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## Submitter Information

**Name:** Linda Billings

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## General Comment

I am fed up with what clearly is the United Nations' agenda interfering with and trying to hijack our immigration policies in this nation. I demand that we protect our sovereignty and demand that the U.N. and its operatives cease and desist from trying to flood our country and annihilate our borders. Tax payers are fed up. We ask that the GOP and Trump administration seriously invest their energies into the United States exiting the United Nations, and demanding that the U.N. relocate to another country that more suits its objectives. We want OUR OWN immigration reform, not what NWO globalists are cramming down our throats. Enough is enough!

AR003629

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1916

Comment Submitted by Kerrigan Marois

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## Submitter Information

**Name:** KERRIGAN MAROIS

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## General Comment

This is inhumane, we as Americans should not enact policies that Hitler would approve of. These asylum seekers are looking to come to our country to make it GREATER.

AR003630

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-rfvr <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1917

Comment Submitted by Ben Gay

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## Submitter Information

**Name:** Ben Gay

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## General Comment

Support our POTUS!

AR003631

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-u5zn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1918

Comment Submitted by Gary Webster

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## Submitter Information

**Name:** Gary Webster

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## General Comment

Pleas support ALL aspects of President Trumps immigration reform proposals. Please don't be a part of the swamp. Thank you

AR003632

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1919

Comment Submitted by Belinda Smart

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## Submitter Information

**Name:** Belinda Smart

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## General Comment

Please, be responsible and give the president enough time to properly check the people who are trying to come into this country. Stop putting up road block when we are just trying to make this country safe for all even you.

AR003633



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-qnq1 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1920

Comment Submitted by James MacMichael

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## Submitter Information

**Name:** James MacMichael

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## General Comment

Our borders need to be secured at all costs PERIOD !! All foreigners must be vetted in order to prevent another 9/11.....or worse !

AR003634

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1921

Comment Submitted by James Wilson

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## Submitter Information

**Name:** James Wilson

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## General Comment

When you were elected to represent us, part of that commitment was to uphold and protect the Constitution of the United States, part of that is supporting the building of a border wall authorized by President Trump, please do your job and get this done ASAP!

AR003635

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-luzg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1922

Comment Submitted by Hugo Ortega

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## Submitter Information

**Name:** Hugo Ortega

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## General Comment

What the heck is the problem? Are we allowing bureaucrats to run our government? Even American companies take their time doing background checks on prospective employees. We must allow for proper time to do background checks on asylum seekers without setting time limits on those who would protect our country from unwanted intruders. Get rid of the time constraints.

AR003636

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1923

Comment Submitted by Elizabeth Steinbach

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## Submitter Information

**Name:** Elizabeth steinbach

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## General Comment

Please, all who enter the USA, need to be checked BEFORE being allowed in our country.

AR003637

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1924

Comment Submitted by Peter Alejandro

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## Submitter Information

**Name:** Peter Alejandro

**Address:**

3546 Mount Vernon Court  
Lawrenceville, GA, 30044

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## General Comment

I urge our government to NOT remove the 30 day processing provision for asylum applicants! Asylum seekers are the most vulnerable immigrants we have. They typically are escaping horrendous situations in their home countries. The United States should be a beacon of hope, empathy, and strength and when we try to make the lives of asylees harder, we show weakness.

Many of these asylum seekers will help benefit our great country and allowing them to obtain a Employment Authorization Document within 30 days of submission gives them the opportunity to begin contributing to our nation. Not only is helping those that need help the most a standing U.S. principal, but also part of our Judeo-Christian core of beliefs.

AR003638

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-oib2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1925

Comment Submitted by JoAnn Matsko

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## Submitter Information

**Name:** JoAnn Matsko

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## General Comment

Really, a time line, why the hurry? You wasted money and time with Trump's Russia collusion, now you want to speed this up. Shame on all of you!

AR003639

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-k001
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1926

Comment Submitted by Freeman Dillard

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## Submitter Information

**Name:** Freeman Dillard

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## General Comment

lease write your comment here. Anyone coming to this country needs to be vetted completely.

AR003640

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<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6j-2js2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1927

Comment Submitted by Lee Belanger

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## Submitter Information

**Name:** Lee Belanger

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## General Comment

Support President Trumps Immigration Reforms. Its time for Congress to stop, playing games, and get to the People's Business.

AR003641



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<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-tvn1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1928

Comment Submitted by Kathleen Kavanagh

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## Submitter Information

**Name:** Kathleen Kavanagh

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## General Comment

I am an immigration attorney who has been working with asylum seekers and other immigrants for approximately 14 years. I write to strongly oppose the proposed rule. As the situation stands, the 30-day adjudication timeline provides some measure of security and predictability to asylum seekers who are already some of the most vulnerable members of our communities. There is absolutely no benefit to further delaying receipt of employment authorization documents (EADs) by asylum seekers. Any spurious concerns that people are simply filing I-589s to get work permits has already been addressed by the 150-day wait period to apply. Introducing further delays and increased unpredictability into the process of obtaining a work permit only increases the time asylum-seeking families must rely on charity or other outside support (or worse, are barely able to get by, facing food insecurity, homelessness, etc.). Lack of work permits prevents them from gaining employment, supporting themselves, and spending into their local economies and the national tax base (note: USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year). Lack of a work permit also often means inability to gain a state ID or license, which can cause access issues for health care, community services, homeless shelters, and other necessary social supports.

I have also seen my work permit-less clients become more vulnerable to exploitative under-the-table employment or worse, trafficking. I have also seen the inability to work and contribute to one's community and family cause emotional and psychological stress. My clients are some of the hardest working, most resilient people I have ever met, and most of them are desperate to work so that they can feel productive and provide for their families and selves.

Furthermore, obtaining an EAD and a job is usually the only way asylum-seeking immigrants can afford to hire a lawyer for their asylum case. It is already unconscionable that often low-educated, non English-speaking asylum seekers are forced to fend for themselves against a trained government lawyer just to seek protection. But to create further barriers to obtaining representation is a threat to the farce of due process in our immigration courts.

AR003642

Lastly, I think it's important as a nation that we turn away from the disgusting, hateful anti-immigrant agenda advanced by the Trump Administration. This proposed rule is plainly part of the administration's inhumane plan to deter asylum seekers from seeking protection in the United States. This is evidenced by this proposed rule change as well as, e.g., the third-country transit bar, the proposed public charge rule, the cruel and unjust Migrant Persecution Protocols ("MPP"), family separation policies, and many other efforts this administration has made to deter the lawful human right to seek asylum. Ironically, by removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude.

As an alternative to this proposed rule, and if the issue is that USCIS claims to need more than 30 days to adjudicate applications and vet applicants, then USCIS should simply allow applications to be submitted further in advance of the 180-day mark, such as at 120 days, which would allow 60 days for adjudication and vetting.

AR003643

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-eowm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1929

Comment Submitted by Joanna Williams, Kino Border Initiative

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## Submitter Information

**Name:** Joanna Williams

**Address:**

PO Box 159

Nogales, 85628

**Email:** jwilliams@kinoborderinitiative.org

**Phone:** 5202872370

**Submitter's Representative:** Joanna Williams

**Organization:** Kino Border Initiative

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## General Comment

The Kino Border Initiative is a 501(c)3 located in Nogales, Arizona and Nogales, Mexico. We are a Catholic organization that provides direct humanitarian assistance to migrants deported from the US and asylum seekers subject to metering. This year, we have served over 100,000 meals to migrants stranded in Nogales, Mexico. Our direct contact with asylum seekers affords us first-hand knowledge of the harms the proposed rule would cause. We oppose the rule change because it subjects asylum seekers, especially young children, to economic insecurity. We recommend rejection because it would force rural communities to forego the fiscal and economic benefits asylum seekers offer. This rule change would also weaken the legal immigration system by reducing court attendance rates.

Delaying the approval of work permits subjects asylum seekers to prolonged economic insecurity. Even under the current rule, families often wait over 18 months after arrival at the border to qualify for a work permit, due to immigration court backlogs, which delay submission of the asylum application to begin the clock for the Employment Authorization Document (EAD). Removing the time limits for USCIS to issue EADs could extend the waiting period to two years, which imposes a substantial additional burden on sponsor families and would especially harm young children through long-term psychological and developmental effects. This year, 67% of the asylum-seeking families that we served in Nogales, Mexico had a child who was age ten and under. For example, early this year a young Honduran mother and her one-year-old baby sought asylum in Nogales and traveled to join her sister in Los Angeles. Because the mother was not authorized to work, her sister could not support them and the mother and her one-year-old were forced into homelessness. The young child now has behavioral challenges due to the experience of homelessness. Children like this baby will likely be long-term

AR003644

members of US society, but their potential to contribute will be hindered due to these early obstacles. Delaying EAD approval will also cause immediate loss of tax revenue and economic productivity. As USCIS recognizes, extending the wait for EADs will likely cause between \$39.15 million to \$118.54 million of lost federal tax revenue. The state and local fiscal impact will also be profound as they won't be able to contribute to local revenue and will be forced to draw on local support programs to survive. For example, asylum seekers will have to apply for low-income bus passes and their children will require additional support at school. If instead USCIS quickly processes EADs, asylum seeking families will contribute to local budgets and use fewer services. This consideration is particularly important for rural towns. Many of the asylum seekers we have received settle in rural Mississippi, Georgia, and Florida, where agricultural and meat packing companies have numerous job vacancies that they have been unable to fill. Preventing asylum seekers from legally working in those industries reduces the profits of those companies and the financial well-being of the towns. Small town economic development is also hindered because family members who host asylum seekers awaiting EADs must expend material support during this time of limbo instead of starting or continuing small businesses.

Finally, this rule change would weaken the legitimacy of our legal immigration process, which depends on the ability of asylum seekers to attend court hearings. Subjecting them to economic insecurity makes it less likely that they will be able to regularly attend court and imposes additional administrative burdens on the already backlogged system. For example, a family who presented for asylum in Nogales two years ago initially joined family members in Kansas. However, their relatives were unable to provide financial support and they had to relocate to California. When they relocated, they filed a change of address with ICE but were unaware that they had to also file paperwork with the immigration court. Therefore, without them realizing, their court hearing was scheduled in Kansas and they were not able to attend. They later filed for and were granted an opportunity to reopen their case, but those additional filings and hearings posed an administrative burden on the court system. Prolonging economic insecurity would make it even more likely that asylum seekers must relocate during their court proceedings, which would both increase the staff hours required for each immigration court case and would decrease appearance rates at court hearings.

This regulation change would inflict unnecessary and unjustified harms on asylum-seeking families, society, and our immigration court system. Instead of removing the processing deadline for EADs, we urge USCIS to allow asylum seekers to submit EAD applications 120 days after filing their asylum application, which would then provide USCIS with a 60 days for processing.

AR003645

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-ykeq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1930

Comment Submitted by Terri Newman

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## Submitter Information

**Name:** Terri Newman

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## General Comment

do right or don't do it at all !!

AR003646

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1931

Comment Submitted by Melissa Brennan

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## Submitter Information

**Name:** Melissa Brennan

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## General Comment

Delaying the ability of asylum seekers to obtain work authorization will harm immigrants and the communities in which they live. Asylum seekers desperately need work authorization to meet their own basic needs. Depriving them on work authorization will only serve to increase poverty and human suffering. It will also lead to an increase in enrollment in public benefits, thereby harming states and municipalities. In addition, businesses need immigrants with work authorization to fill jobs. I reside in the State of Maine which is currently experiencing a workforce shortage. We need more work authorized people -- not less!

Furthermore, if USCIS feels that it is unable to comply with existing legal requirements, there is a very simple alternative. As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCIS's goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR003647

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6j-crol
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1932

Comment Submitted by Nun Yurbyznes

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## Submitter Information

**Name:** Nun Yurbyznes

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## General Comment

Our country is less safe today because of arbitrary bureaucratic timelines for illegal immigrants. Support President Trumps immigration reforms now!

AR003648

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6i-7s2g <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1933

Comment Submitted by Craig Brown

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## Submitter Information

**Name:** Craig Brown

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## General Comment

I support the Trump agenda and you should too.

AR003649



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-eqra
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1934

Comment Submitted by Tim Kelly

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## Submitter Information

**Name:** Tim Kelly

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## General Comment

Please support President Trump's reforms on immigration

We elected President Trump and expect his reforms to be implemented. We need to get the immigration mess under control and follow the law.

AR003650

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-fm3p <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1935

Comment Submitted by Mike Petrovich

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## Submitter Information

**Name:** Mike Petrovich

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## General Comment

It is time for Congress to support President Trump's great Immigration Reforms.

All who aid or abet illegal aliens are guilty of Federal Felony.

AR003651

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-esxn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1936

Comment Submitted by Andrew Lopez

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## Submitter Information

**Name:** Andrew Lopez

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## General Comment

You members of Congress need to allow President Trump to continue to do his job to fix the Immigration problems. They have ignored by Congress and Presidents who didnt want to get their hands dirty.

AR003652

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-s3rn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1937

Comment Submitted by Stephen Sherer

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## Submitter Information

**Name:** Stephen Sherer

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## General Comment

With thousands of asylum seekers trying to enter the US, it is folly to require a yea or nay within 30 days. We could disqualify good candidates and admit bad ones. Let's protect the American people and the system by removing the artificial deadlines.

AR003653

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-8k5q
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1938

Comment Submitted by Toni Maschler

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## Submitter Information

**Name:** Toni Maschler

**Address:** United States,

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## General Comment

I am very troubled by the proposal to eliminate the 30-day processing deadline for approving or denying asylum applicants' first application for work authorization. This appears to be an attempt to eliminate any accountability by the government, and will harm asylum seekers, nonprofits, and the overall U.S. population by extending the period during which asylum applicants may not legally work and support themselves or their families. Asylum seekers are currently forced to wait a minimum of 150 days after applying for asylum before they are eligible to apply for work authorization. The 150-day waiting period already imposes great hardship on asylum-seekers and those who help them, because there is no federal provision of food, housing, clothing, or any other pressing need of those who have been forced to flee their former homes. If the processing time regulation poses hardship to the government, then the 150-day waiting period could be reduced. If asylum applicants were permitted to apply after 120 days, for example, the government could have 60 days and the asylum applicant would still receive his or her work permit by 180 days from the date of application. UNDER NO CIRCUMSTANCES SHOULD THE TIME UNTIL RECEIPT OF THE WORK PERMIT BE INCREASED. In fact, I think it would be preferable to REDUCE the time until the work permit is issued, if anything. The work permit is generally a requirement for applying for a social security number. We should want the vetting process of getting a social security number and other checks to take place sooner, rather than later. And in light of our budget needs, in addition to humanitarian and security concerns, we should welcome asylum applicants becoming self-supporting as soon as possible.

AR003654

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-3cc0 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1939

Comment Submitted by Gail Wechsler

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## Submitter Information

**Name:** Gail Wechsler

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## General Comment

I am writing to oppose rules that would make it harder for asylum seekers to find work while their claims are being considered. I believe that asylum seekers have a right and a desperate need to be able to find gainful employment while they and family members wait for the court to decide their case. I have worked with asylum seekers fleeing home countries due to a well founded fear of persecution due to their religion or political beliefs. They need to be able to support themselves and their families to avoid having to go hungry. People fleeing terrible home conditions and horrible persecution should not be penalized for seeking their legitimate right to file for asylum. Please don't make the rules harder for these brave people.

Gail Wechsler, JD

AR003655

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-wih3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1940

Comment Submitted by David Stovall

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## Submitter Information

**Name:** David Stovall

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## General Comment

Please support President Trumps Immigration reforms. I believe he is acting in the best interest of the United States of America & our citizens.

AR003656

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-8gvb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1941

Comment Submitted by Sarah Perez

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## Submitter Information

**Name:** Sarah Perez

**Address:**

3229 Sabrina Ct

Las Vegas, NV, 89117

**Email:** haras\_zerep@hotmail.com

**Phone:** 7028587074

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## General Comment

I oppose the removal of the 30-day processing provision for employment authorization for asylum applicants. Employment authorizations are critical. People need to be able to work in order to support themselves and their families. Eliminating this provision will not eliminate asylum seekers, it will only cause a strain because those who are unable to work will become a charge to their communities. The removal of this provision only makes the situation worse and does nothing to curtail the number of asylum seekers. Asylum seekers won't stop fleeing danger and persecution because of the elimination of this provision.

AR003657



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-2x99
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1942

Comment Submitted by Sarah Pitney, Benach Collopy LLP

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## Submitter Information

**Name:** Sarah Pitney

**Address:**

4530 Wisconsin Ave. NW

Ste. 400

Washington, 20016

**Email:** spitney@benachcollopy.com

**Phone:** 2026448600

**Fax:** 2026448615

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## General Comment

My name is Sarah Pitney and I am an immigration attorney with Benach Collopy LLP in Washington, DC. I oppose this rule because it will cause financial devastation to asylum seekers and reduce tax revenue to the United States government. Asylum seekers are already forced to wait 150 days to be able to even apply for employment authorization. By forcing them to wait even longer for their application to be processed, this rule will effectively ensure that asylum seekers are not able to work and provide for their families for a year or more (given the current 6 month processing time for almost all other categories of employment authorization). This will lead to more families become homeless and more children going hungry. It also works counter to the trump administration's goals of ensuring that asylum seekers appear for their court hearings; without income to pay for transportation to court, they are less likely to be able to appear for their hearings and thus more likely to be deported (which is probably one of the intended goals of this rule). The rule will also lead to a serious decrease in tax revenue by many millions of dollars, because asylum seekers will be forced to work in an informal economy where their income is not taxed and they are not provided with the means or the information to submit income tax returns. This rule is just another attempt by the trump administration to drive asylum seekers away from the United States, and the cruelty inherent in the rule is frankly astounding.

AR003658

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-mlh2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1943

Comment Submitted by Karen Nish

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## Submitter Information

**Name:** KAREN NISH

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## General Comment

I would hope that our elected officials in Washington would know their own systems better than to expect anything can get done in less than thirty days, especially back ground checks. I personally know people who have had them done and it can take at best ninety days and at worst over a year. Why would we let anyone in to this country without knowing who they are? The immigrants who are following the rules should be our first priority, always! Please reconsider this ill advised rule and do the right thing! Please stop playing politics!

AR003659

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-tsay
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1944

Comment Submitted by Jim Vespermann

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## Submitter Information

**Name:** Jim Vespermann

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## General Comment

Enough of this lying bull! Do you people want a revolution, you will lose, stop the lies and do what you are suppose to do, work for your people! Forgot about that!!!!!!! Idiots!

AR003660

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-qd5e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1945

Comment Submitted by Kelly Johnson

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## Submitter Information

**Name:** Kelly Johnson

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## General Comment

Support President Trump's immigration policies and stop the senseless impeachment process.

AR003661

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-yyoy <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> API
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1946

Comment Submitted by Karin Tolgu, The Law Offices of Karin Tolgu, PLLC

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## Submitter Information

**Name:** Karin Tolgu

**Address:**

600 Stewart St, Ste 400  
Seattle, WA, 98101

**Email:** karin@karintolgulaw.com

**Phone:** 2062737960

**Submitter's Representative:** NA

**Organization:** The Law Offices of Karin Tolgu

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## General Comment

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue NW  
Mailstop #2140  
Washington, D.C. 20529-2140

DHS Docket No. USCIS-2018-0001  
84 F.R. 47148

November 7, 2019

To Whom It May Concern:

Karin Tolgu, through The Law Offices of Karin Tolgu, PLLC, respectfully submits this comment to the Department of Homeland Security's Notice of Proposed Rulemaking on Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

AR003662

Interest in the Proposed Rule:

I am an attorney and owner of a firm that practices immigration law exclusively, with a large percentage of my firms clients being asylum seekers in the affirmative process through USCIS Asylum Office or the defensive process at EOIR. As an attorney working with these extremely vulnerable populations, I can see first-hand the transformational nature that work authorization has on my clients lives, and the extreme hardships that a longer wait for such authorization will cause.

Department of Homeland Security Notice:

The below comment is being offered in opposition to the DHS Notice of Rulemaking that proposes to eliminate the current 30-day requirement for the processing of initial EADs for asylum seekers (DHS Docket No. USCIS-2018-0001)

1. Asylum seekers are people who have fled their home countries, often at a moments notice: almost always, they have no means other than work to provide lifes most basic necessities such as shelter and food for themselves and their children while waiting for their cases to be adjudicated. Regulation already provides that they must wait 180 days after filing their asylum application before they become eligible for an EAD: a very long wait. Prolonging this time period will necessarily drive asylum seekers to find employment through unscrupulous employers who exploit such undocumented workers, forcing them to accept unsafe working conditions and wages that are below the minimum wage. In essence, the rule will empower domestic labor traffickers and employers who harm US workers by hiring undocumented individuals and paying them less than legal minimum wage.
2. Without steady employment, asylum seekers are less likely to be able to hire legal counsel, making it less likely that they will ultimately prevail on their claims. Nationwide, fewer than 3% of pro se asylum applicants win relief; many applicants without a lawyer are deported, despite having strong claims.
3. With lawful work, asylum seekers are much more likely to have access to health care, therefore decreasing public health risks that untreated medical conditions pose. They are also more likely to access mental health care: a crucial necessity for a population that has extremely high rates of PTSD and other trauma-related conditions.
4. The proposed rule, in essence, would cause extreme hardship to an already vulnerable population; in conjunction with many other rules re-vamping the asylum process being implemented by DHS/USCIS/DOJ, it is part of a concerted political effort to make the life of asylum-seekers so difficult that they would simply give up and leave. As a nation of immigrants bound by domestic law and international obligations to protect those seeking protection on our shores, it is shamefully mean-spirited to on one hand decry the burden asylum seekers impose on our society and on the other, deny them ability to work. This rule should be REJECTED and the 30-day processing requirement for initial EAD applications for asylum seekers RETAINED.

Sincerely,  
Karin Tolgu

AR003663

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-qf76
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1947

Comment Submitted by Steven Freeman, Anti-Defamation League

---

## Submitter Information

**Name:** Steven Freeman

---

## General Comment

Please find attached ADL's submission in opposition to the proposed rule.

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## Attachments

ADL comments for submission on EAD

AR003664

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November 7, 2019

Samantha Deshommes

Chief, Regulatory Coordination Division

Office of Policy and Strategy, U.S. Citizenship and Immigration Services

Department of Homeland Security

20 Massachusetts Avenue NW

Washington, DC 20529-2140

RE: DHS Docket No. USCIS-2018-0001

Dear Chief Deshommes,

On behalf of the Anti-Defamation League (ADL), we write in opposition to the proposed rule by the U.S. Department of Homeland Security (DHS) to remove the regulatory provision that states the U.S. Citizenship and Immigration Services (USCIS) has 30 days from the date that an Employment Authorization Document (EAD) application is filed to grant or deny that application. We strongly urge that this regulation remain in place.

ADL, founded in 1913 to stop the defamation of the Jewish people and to secure justice and fair treatment to all, represents a community that has experienced the plight of living as refugees throughout its history. We recall all too well when Jewish refugees fleeing the Holocaust were denied entry into the U.S. As a matter of principle, ADL has advocated for fair and humane immigration policies since its founding. ADL views this as an important priority and has been a leader in exposing anti-immigrant rhetoric and the mainstreaming of hate, as well as government action motivated by racial animus.

ADL is concerned that the proposed rule would mean that asylum seekers who apply for authorization to work in the U.S. while waiting for their asylum claims to be adjudicated will experience indeterminate and prolonged wait times. It is notable that asylum seekers must already wait 150 days from the filing of their asylum claims to submit their EAD applications, and these applications cannot be granted until 180 days have passed since the initial asylum filing. This means asylum seekers must already wait approximately six months before being eligible for authorization to work.



Even with the 30-day rule in place, protracted delays were commonplace prior to a court ruling ordering USCIS adhere to the rule and timely adjudicate applications. These delays caused serious issues for asylum seekers including but not limited to the inability to work and to access essential social services. Asylum seekers who are unable to work will struggle to pay for food, to afford housing, to support their families, and to access other critical services. The inability to support oneself can in turn cause stress and fear – which is especially undesirable for a vulnerable population fleeing persecution. If the provision were removed, the government has affirmed that the wait times for employment authorization to be granted would increase, thereby further exacerbating the challenge to asylum seekers.

ADL is concerned that this action is part of a broader effort by the Administration to deter asylum seekers from seeking refuge in the United States, a fundamental legal right in the U.S. and core to our nation's principles. Individuals fleeing persecution in their home countries and seeking asylum in the U.S. must overcome countless hurdles to achieve safety and security. The Administration has tried to limit where individuals fleeing persecution may enter the U.S. to request asylum, it has sought to restrict how many individuals can enter the U.S. per day by way of a process which has become known as “metering,” and it has forced migrants back over the Southern border into Mexico to await court adjudications of their claims despite the serious safety concerns implicated. Combined with other government actions such as the odious Muslim Ban and the heartless “Zero Tolerance” policy – which saw children, including babies, torn out of their parents' arms while attempting to cross the border – the proposed revocation of the 30-day provision sends a message to vulnerable immigrants seeking asylum that the United States does not care for their safety and wellbeing, or what happens to them while they wait for the chance to prove their claims.

The asylum process is typically protracted and may take several years to resolve. As of May 2019, almost 330,000 affirmative asylum applications were reportedly pending with USCIS. The general backlog of cases in immigration court topped one million in 2019 and individuals are waiting an average of 687 days for a case outcome. This is an astonishing length of time to be left in limbo.

The government has proven that it is capable of processing EAD applications within 30 days. It is presently doing so for the majority of EAD applications filed.

If additional time is required to thoroughly vet and process applications, USCIS should permit asylum seekers to submit their applications sooner. Specifically, EAD applications could be submitted at the same time as the initial asylum application is filed. Significant personal information is included in the asylum application which should enable the government to conduct all necessary national security screenings and identity verification.

For decades the U.S. has served as a global leader and a model, accepting large numbers of refugees and asylees and facilitating their integration into our society. We urge the government to continue to permit individuals seeking asylum to work while their cases are pending and to allow the regulation requiring EAD applications to be processed in 30 days to remain in place to provide certainty and reassurance to an already vulnerable group.

Sincerely,

A handwritten signature in cursive script that reads "Steven M. Freeman". The signature is written in dark ink and is positioned below the word "Sincerely,".

Steven M. Freeman  
Vice President, Civil Rights

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-edxt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1948

Comment Submitted by Pam Lucas

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## Submitter Information

**Name:** Pam Lucas

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## General Comment

I served over 24 years in the military to keep our country safe and now our own country wants to allow anyone in. How disrespectful

AR003668

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-d1up <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1949

Comment Submitted by Carmen Kuntz

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## Submitter Information

**Name:** Carmen Kuntz

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## General Comment

Please build the wall and help our border patrols do their job

AR003669

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-s07q
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1950

Comment Submitted by Charles Kraus

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## Submitter Information

**Name:** Charles Kraus

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## General Comment

This migration of aliens must be slowed, I wat you to support President Trump's immigration reforms. C.T. Kraus voter

AR003670

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-5u7t <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1951

Comment Submitted by Shirley Ponik

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## Submitter Information

**Name:** Shirley Ponik

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## General Comment

Stop the beaucracts changinnng the timeline.

AR003671

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6j-psvf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1952

Comment Submitted by David Wilson

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## Submitter Information

**Name:** david wilson

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## General Comment

This proposed rule is simply bad government. The law already limits who is eligible for work authorization. The administration does not need to empower administrative foot dragging for individuals who are nearing their lifelines. The purpose of this new rule is to deter asylum, which is well beyond the scope of the intended regulation. The Agency is attempting to violate the APA by rulemaking here to address a different concern. This rule is bad for law enforcement, state governments, and the administration of law.

The USCIS proposed rule to remove the 30-day processing provision for asylum applicant-related applications for work authorization (I-765) should not move forward.

Such a change will be detrimental to the overall asylum system and in contravention of U.S. laws that dictate asylum seekers rights.

Ensuring asylum-seekers' request for work authorization are timely processed and approved will improve the asylum system's efficiency.

It will enable asylum seekers who are within the law to seek asylum obtain work authorization so that they may be self-sufficient while their asylum applications are pending.

It will help to save lives, which is a value we hold in the USA.

There is no rationale reason to make this change, which would only harm asylum seekers who have already survived persecution and are simply requesting safe haven in the USA, for which they have a legal right to apply under US law.

AR003672

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-liqu
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1953

Comment Submitted by Aubra Fletcher

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## Submitter Information

**Name:** Aubra Fletcher

**Address:**

P.O. Box 189402

Sacramento, CA, 95818

**Email:** aubrafletcher@gmail.com

**Phone:** 5104995264

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## General Comment

Please keep the current employment authorization provisions and processes in place - or else do away with the "clock" system so that asylum applicants can immediately seek - and timely obtain - work authorization while they await adjudication of their applications. Many applicants have small children who need to be fed.

Changing the rule in the manner that has been proposed will not deter people from entering the United States and seeking asylum. So many are fleeing violence in their home countries, not (just) economic problems. They are going to seek safe havens for themselves and their families no matter what, because that is what humans do. Asylum seekers should of course be well vetted and their applications considered according to the law. Permitting employment during the pendency of asylum applications will not interfere with the vetting or adjudication process.

AR003673



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-1rx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1954

Comment Submitted by Diana Mateo

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## Submitter Information

**Name:** Diana Mateo

---

## General Comment

Asylum seekers' livelihoods would be at risk without employment and income. They will suffer from severe financial loss to self and family. They will not be able to afford basic necessities, which is inhumane as they are already fleeing atrocities in their home countries. Moreover, without a valid work permit, they will be subject to exploitation and much more likely to feel forced to become a public charge. I fully oppose the elimination of the 30-day deadline for adjudicating initial asylum EADs.

AR003674

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-kkrh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1955

Comment Submitted by Becky Jackson

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## Submitter Information

**Name:** Becky Jackson

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## General Comment

Please quit messing around and support President Trump's Immigration Reforms

AR003675

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-zpdd <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1956

Comment Submitted by Michael Penn

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## Submitter Information

**Name:** Michael Penn

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## General Comment

Please work with our President to secure our borders and write a better way to come over legally

AR003676

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-e9k3 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1957

Comment Submitted by Lenus Moore

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## Submitter Information

**Name:** Lenus Moore

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## General Comment

We need trump's immigration reform now before it's to late.

AR003677

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-t47u
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1958

Comment Submitted by Nazim Karaca

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## Submitter Information

**Name:** Nazim Karaca

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## General Comment

As a result of the Rosario litigation, USCIS is now adjudicating initial asylum EAD applications within 30 days. In response, USCIS has proposed to simply eliminate the 30-day deadline. This proposed rule will harm asylum seekers and their families, and USCIS even estimates it will lead to \$100s of millions of lost tax revenue. It treats completely "legal" asylum seekers as inferior people. Even worse, the delay is contrary to national security interests. And, since USCIS has been able to deal with these applications within 30 days 99% of the time, it's demonstrably able to do so.

In other words, it's inhumane, less secure AND burdensome for taxpayers.

AR003678

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-7l24
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1959

Comment Submitted by Carole Veer

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## Submitter Information

**Name:** Carole Veer

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## General Comment

President Trump does not need a ridiculous timeline for immigration reform. We need time to properly check immigrants who are trying to come to our country legally. I fully support building the wall.

AR003679

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-xk83 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1960

Comment Submitted by Steve Atkinson

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## Submitter Information

**Name:** Steve Atkinson

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## General Comment

Time to support President Trump on immigration reforms. Holding up his reforms puts us all at high danger. Just recently that poor mormon family in Mexico was slaughtered. Do we want that here? Not me. Support the presidents reforms now!

AR003680

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-su2t
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1961

Comment Submitted by Shanna Edwards

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## Submitter Information

**Name:** Shanna Edwards

---

## General Comment

Please come up with a reasonable way to fix the out of control immigration. Those allowed into our country should be screened, and reasonable time should be allowed for that process to take place. Please support Trump's immigration reforms.

AR003681



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-36q1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1962

Comment Submitted by George Adams

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## Submitter Information

**Name:** George Adams

---

## General Comment

The thirty day limit for investigation of asylum claims by illegal immigrants is a farce. This is not enough time given the flood of illegals crossing the border or seeking to do so as asylum seekers. Tying the hands of immigration officials endangers all American citizens and legal immigrants. You must support immigration reforms put forth by President Trump. Do not fail your constituents.

AR003682

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-n18e <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1963

Comment Submitted by Peggy Watson

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## Submitter Information

**Name:** Peggy Watson

---

## General Comment

Help President Trump secure America's safety by removing this arbitrary bureaucratic timeline. Please stop the illegal immigration.

AR003683

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-xepo <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1964

Comment Submitted by Jean Craig

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## Submitter Information

**Name:** Jean Craig

---

## General Comment

There is a reason told the Israelites to put walls around them it is designed to keep us save from evil neighbors that want to rob us of the fruits of our labors, not their labors. We will no longer be a country if we do not secure our borders. And the dems will be killed right along with all the rest.

AR003684

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-qsht <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1965

Comment Submitted by George Squier

---

## Submitter Information

**Name:** George Squier

---

## General Comment

Every immigrant including those requesting sanctuary MUST be thoroughly vetted, regardless of the time it takes, in order to protect the Citizens and the Constitution of this nation, which you are supposed to be serving.

AR003685

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-46hj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1966

Comment Submitted by Justin Collins

---

## Submitter Information

**Name:** Justin Collins

---

## General Comment

Please let the Trump administration check the backgrounds of all asylum seekers.

AR003686

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1967

Comment Submitted by Ann Samuelson

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## Submitter Information

**Name:** Ann Samuelson

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## General Comment

Plse work with POTUS to remove timelines in immigration reform to keep our country safe.

AR003687

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-2p1m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1968

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

PLEASE DO NOT REMOVE THE 30 DAY PROCESSING PROVISION FOR ASYLUM APPLICANTS!!!  
This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

Proposed Alternative: As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR003688

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1969

Comment Submitted by Pat Keberlein

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## Submitter Information

**Name:** Pat Keberlein

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## General Comment

I have been very concerned about the illegal immigrants coming into this country without background checks. You need to support president Trump and his efforts to control the border. Eliminate the time deadline on these checks.

AR003689



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1970

Comment Submitted by Chris Cagle

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## Submitter Information

**Name:** Chris Cagle

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## General Comment

While the greater part of 68,000 Americans died of drug overdoses, coming across the Mexican border, gang members and terrorists. We're worried about the Kurds, how many of them died last year? Send troops to the border and start protecting American citizens!

AR003690

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1971

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

These refugees are ALREADY residing here in our country! The idea that this rule is going to help national security makes no sense. If one of these people is posing a threat to our national security, I would want their applications to be processed AS SOON AS POSSIBLE instead of allowing them to sit in a folder on someone's desk indefinitely. Why in the world would we allow someone who might be a national security threat to stay in our country any longer than they have to? Think about it. That is so stupid and illogical.

Also, this proposed rule goes against the self-interest of all Americans and will hurt our economy. Delaying work authorization for the asylum seekers will cost us millions of dollars in tax revenue, because they won't be able to contribute to social security, Medicare, or pay their local and state taxes, even though they can take advantage of some social services and resources like calling 911 in an emergency

Why should the rest of us be responsible for contributing the missing part of these resources? Cancel this nonsensical proposed rule and hurry up and process their applications as soon as you can, for the good of us all.

AR003691

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1972

Comment Submitted by Michael Meehan, Law Office of Michael J. Meehan

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## Submitter Information

**Name:** MICHAEL MEEHAN

**Address:**

HICKSVILLE, NY, 11801

**Email:** MJMEEHANESQ@GMAIL.COM

**Phone:** 5168224142

**Organization:** LAW OFFICE OF MICHAEL J .MEEHAN

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## General Comment

I write to strongly oppose the proposed rule. As the situation stands, the 30-day adjudication timeline provides some measure of security and predictability to asylum seekers who are already some of the most vulnerable members of our communities. There is absolutely no benefit to further delaying receipt of employment authorization documents (EADs) by asylum seekers. Any spurious concerns that people are simply filing I-589s to get work permits has already been addressed by the 150-day wait period to apply. Introducing further delays and increased unpredictability into the process of obtaining a work permit only increases the time asylum-seeking families must rely on charity or other outside support (or worse, are barely able to get by, facing food insecurity, homelessness, etc.). Lack of work permits prevents them from gaining employment, supporting themselves, and spending into their local economies and the national tax base (note: USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year). Lack of a work permit also often means inability to gain a state ID or license, which can cause access issues for health care, community services, homeless shelters, and other necessary social supports.

I have also seen my work permit-less clients become more vulnerable to exploitative under-the-table employment or worse, trafficking. I have also seen the inability to work and contribute to one's community and family cause emotional and psychological stress. My clients are some of the hardest working, most resilient people I have ever met, and most of them are desperate to work so that they can feel productive and provide for their families and selves.

Furthermore, obtaining an EAD and a job is usually the only way asylum-seeking immigrants can afford to hire a lawyer for their asylum case. It is already unconscionable that often low-educated, non English-speaking asylum

AR003692

seekers are forced to fend for themselves against a trained government lawyer just to seek protection. But to create further barriers to obtaining representation is a threat to the farce of due process in our immigration courts.

As an alternative to this proposed rule, and if the issue is that USCIS claims to need more than 30 days to adjudicate applications and vet applicants, then USCIS should simply allow applications to be submitted further in advance of the 180-day mark, such as at 120 days, which would allow 60 days for adjudication and vetting.

AR003693

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-htal
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1973

Comment Submitted by Pete Peterson

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## Submitter Information

**Name:** Pete Peterson

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## General Comment

Please please support Trumps immigration reforms as there are obviously some very bad people among the many that are trying to enter the USA. Immigrants from over 140 countries have been found there and it is the FIRST responsibility of govt. to protect USA citizens

AR003694

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6j-utho
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1974

Comment Submitted by Joyce Song

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## Submitter Information

**Name:** Joyce Song

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## General Comment

This proposed regulation is harmful to families who have experienced severe trauma in their home countries and are looking to fulfill the promise of the American dream. Preventing Asylum seekers from getting employment authorization means they are unable to support themselves and their families, compels them to access more public benefits (which the administration penalizes them for doing through their proposed public charge rule), makes them more vulnerable to unscrupulous employers, and adds further mental and emotional stress to already traumatized families. This regulation is inhumane and should be rejected.

AR003695

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1975

Comment Submitted by Sandra Smith

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## Submitter Information

**Name:** Sandra Smith

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## General Comment

I want the borders closed to everyone that is not a citizen of this country. If they want in let them do it the legal way.

AR003696

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-ahpf <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1976

Comment Submitted by Debra Estridge

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## Submitter Information

**Name:** Debra Estridge

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## General Comment

I am asking you to support Pres. Trump's immigration reforms. The Trump Administration has a timeline of 30 days to vet all immigrants that come into this country. This arbitrary timeline is making officials cut corners and keeping the country unsafe. Please support Trump's reforms!

AR003697



# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1977

Comment Submitted by Charles Stewart

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## Submitter Information

**Name:** Charles Stewart

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## General Comment

I urge you to support President Trump's Immigration Reforms. We need to take control of our borders and enforce our laws. Our economic system and our way of life are threatened by the obstruction of this common-sense policy.

AR003698

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1978

Comment Submitted by Emilia Kaczynski

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## Submitter Information

**Name:** Emilia Kaczynski

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## General Comment

Asylum seekers are here legally seeking protection from persecution. Please preserve their right to work so that they can continue to contribute to our communities and to our country's economy. Asylees are an important part of our immigrant communities!

AR003699

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1979

Comment Submitted by James Noble

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## Submitter Information

**Name:** James Noble

**Address:**

4470 W Rodeo Rd

Santa Fe, 87507

**Email:** jim@noblelawfirm.com

**Phone:** 5054666127

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## General Comment

Immigrants who are in this country who are seeking asylum need to be able to support themselves it is important that there be no delays I am completely against this proposed change to the regulation

AR003700

# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k3-9d6i-2iq6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1980

Comment Submitted by Rachel Binstock

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## Submitter Information

**Name:** RACHEL BINSTOCK

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## General Comment

I am an immigration attorney and I would like to oppose this new rule because delays in asylum seekers getting their work authorization approval can lead to:

Lost income to the asylum seeker and their family

Food insecurity

Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID.

Risk of homelessness/housing insecurity

Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify)

Vulnerability to exploitation, trafficking, and underground economy risks

Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income)

Loss of ability to support themselves and their families

Feelings of fear, desperation, and overall mental health concerns

Furthermore there will be lost tax revenue for the government. USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

AR003701

# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k3-9d6l-3v10
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1981

Comment Submitted by Jeanette Mitchell

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## Submitter Information

**Name:** Jeanette Mitchell

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## General Comment

Asylum seekers need to be thoroughly checked for the safety of our citizens.

AR003702

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1982

Comment Submitted by Daniel Hamill

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## Submitter Information

**Name:** Daniel Hamill

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## General Comment

Immigration authorities need sufficient time to investigate, or "vet" prospective immigrants coming into our country. Restrictions on how much time they have to do this really should be repealed. The safety and security of our citizens comes first in these matters! Thank you for your time and attention.

AR003703

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1983

Comment Submitted by Elizabeth Rand

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## Submitter Information

**Name:** Elizabeth Rand

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## General Comment

I have responded previously regarding the necessity of supporting President Trump's Immigration Reforms. At that time, I did not mention that my cousin was killed by an illegal alien. How would one expect me to feel about this issue? Citizen safety is of the utmost importance!

AR003704

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1984

Comment Submitted by Thomas Mealey

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## Submitter Information

**Name:** Thomas Mealey

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## General Comment

What a Farce. How can any one give such a short time to do a safe & thorough review. Is this individual Pro Immigration & hates America. Also sounds stupid.

AR003705



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1985

Comment Submitted by Gary Miller

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## Submitter Information

**Name:** Gary Miller

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## General Comment

Dear Sir/Madam

It is imperative that you support President Trumps Immigration Reforms, for the safety of the Citizens of Our Nation. We have been subjected to crimes and violence coming from illegal immigrants and falsified asylum requests for far too long. As your constituent, I implore you to stand with the President on this issue.

AR003706

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1986

Comment Submitted by James Smith

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## Submitter Information

**Name:** James Smith

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## General Comment

As a citizen of the United States, I am requesting you support our President's efforts on immigration reform. Thank you!

AR003707

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-ewqd <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1987

Comment Submitted by Robert Camp

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## Submitter Information

**Name:** Robert Camp

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## General Comment

I am requesting that you support President Trump in his Immigration Reform.

AR003708

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-qh34
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1988

Comment Submitted by Fitzgerald Lewis

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## Submitter Information

**Name:** Fitzgerald Lewis

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## General Comment

I think it is only fair for a applicant receive a timely response from the Government and 30 days is amply time for the Government to respond to an application. Thank you

AR003709

# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k3-9d6l-zhz1
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1989

Comment Submitted by Irena Sullivan, Tahirih Justice Center

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## Submitter Information

**Name:** Irena Sullivan

**Organization:** Tahirih Justice Center

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## General Comment

Please find attached comments from the Tahirih Justice Center re: <https://www.regulations.gov/document?D=USCIS-2018-0001-0001>.

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## Attachments

Tahirih Comments - elimination of 30 day EAD timeframe

AR003710

November 8, 2019

Submitted via [www.regulations.gov](http://www.regulations.gov)

Samantha Deshommes, Chief  
Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security

**Re: Comments in Response to Proposed Rulemaking: Removal of 30- Day Processing Provision for Asylum Applicant - Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001; 84 F.R. 47148**

Dear Chief Deshommes:

The Tahirih Justice Center (Tahirih) is pleased to submit the following comments in response to the Department of Homeland Security's (DHS) Notice of Proposed Rulemaking (NPRM) on Removal of 30-Day Processing Provision for Asylum Applicant – Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001; 84 F.R. 47148.<sup>i</sup>

**I. Introduction**

Tahirih is a national, nonpartisan policy and direct services organization that has assisted over 25,000 immigrant survivors of gender-based violence (GBV) over the past twenty-two years. Our clients endure horrific abuses such as human trafficking, domestic violence, sexual assault, forced marriage, and honor crimes. Many of our asylum-seeking clients are indigent and have limited support systems to assist them while awaiting employment authorization from United States Citizenship and Immigration Services (USCIS). Currently, regulations require USCIS to adjudicate an asylum applicant's initial application for an Employment Authorization Document (EAD) within 30 days of filing.<sup>ii</sup> **DHS' proposal through this NPRM to eliminate this requirement will severely disadvantage survivors of GBV such as our clients. We therefore strongly oppose DHS' proposed rule and instead urge you to maintain the 30-day adjudication deadline currently required by the regulations.**

**II. DHS' Justifications for Issuing the Proposed Rule are Arbitrary and Capricious and Do not Outweigh the Harm the Rule will Unnecessarily Cause to Survivors of GBV**

**A. The Proposed Rule is Arbitrary and Capricious**

**ATLANTA**

230 Peachtree Street NW  
Atlanta, GA 30303  
Tel: 470-481-4700  
Fax: 470-481-7400  
Atlanta@tahirih.org

**BALTIMORE**

211 E. Lombard Street  
Suite 307  
Baltimore, MD 21202  
Tel: 410-999-1900  
Fax: 410-630-7539  
Baltimore@tahirih.org

**GREATER DC | NATIONAL**

6402 Arlington Boulevard  
Suite 300  
Tel: 571-282-6161  
Fax: 571-282-6162  
TTY: 711  
Falls Church, VA 22042  
GreaterDC@tahirih.org  
Justice@tahirih.org

**HOUSTON**

1717 St. James Place  
Suite 450  
Houston, TX 77056  
Tel: 713-496-0100  
Fax: 713-481-1793  
Houston@tahirih.org

**SAN FRANCISCO BAY AREA**

881 Sneath Lane  
Suite 115  
San Bruno, CA 94066  
Tel: 650-270-2100  
Fax: 650-466-0006  
SFBayArea@tahirih.org

[tahirih.org](http://tahirih.org)

AR003711

DHS asserts that eliminating the 30-day EAD adjudication period is necessary to make USCIS' fraud detection efforts more effective. Yet, USCIS is already permitted to take more time for EAD processing, by requesting additional documents from an applicant where deemed necessary, for example, where fraud is suspected. The proposed rule cannot, therefore, be justified on this basis and is arbitrary and capricious.

**B. Delaying EADs will Further Harm Traumatized Survivors of GBV**

Under the proposed rule, asylum seekers will be forced to wait for EADs indefinitely, with no recourse or end in sight. While DHS considered replacing the 30-day adjudication timeframe with 90-days,<sup>iii</sup> DHS ultimately proposes no timeframe at all, such that significant delays could be the new, acceptable norm.

Yet, survivors of GBV applying for asylum who have endured severe trauma are in desperate need of resources to rebuild their lives. Survivors who have little or no support network to rely on will face significant financial hardship. This includes the chronic threat or lived reality of homelessness, and the hunger and health problems that accompany it for both themselves and their children. Furthermore, asylum applicants are ineligible for federal public assistance. With their ability to earn income delayed or worse - effectively foreclosed, survivors will be unable to access much-needed mental and physical health services. If *pro bono* or low-cost legal services are unavailable where a survivor lives, she will be unable to pay for a lawyer. Survivors' cases are complex, and representation often means the difference between safety or return home to face additional violence or even death.<sup>iv</sup> Keeping survivors in poverty further compounds and prolongs healing and prevents them from integrating into society, depriving communities of their contributions and productivity as members of the work force.

Indigent individuals are also often highly vulnerable to exploitation because they depend on others for survival. Through no fault of their own, asylum seekers forced to participate in the 'shadow economy' in order to survive are at the mercy of unscrupulous employers. Some withhold wages, pay much less than originally agreed to, demand very long hours, impose abusive conditions, or threaten or perpetrate violence against workers in this situation who have, or believe they have, no recourse. Working without authorization also jeopardizes asylum claims, yet the alternative might be living on the streets.

Finally, work authorization for asylum applicants simultaneously facing domestic violence in the US can literally mean the difference between life or death. It is no surprise, least of all to abusers, that close to 100% of survivors of domestic violence report suffering financial abuse,<sup>v</sup> and 75% of women report staying in abusive relationships due to economic barriers.<sup>vi</sup> Delaying EADs for survivors under these circumstances rewards perpetrators, giving them critical leverage to further manipulate their victims. Conversely, if those facing domestic violence are authorized to work, then abusers are deprived of a primary tool of abuse – the threat of reporting the survivor to DHS.

**III. The Proposed Rule Poses a Burden for Tahirih**

If USCIS' EAD adjudication timeframe is no longer in effect as proposed by DHS, asylum seekers' need for longer-term non-legal assistance will increase. Tahirih's social services staff will undoubtedly lack the capacity to effectively meet the needs of current and future clients who will now need more help avoiding homelessness and hunger while waiting for work authorization.

#### IV. Conclusion

Keeping asylum seekers in a state of poverty while waiting for their claims to be heard will not deter them from escaping life-threatening persecution at home. Furthermore, the current 30-day EAD adjudication timeline does not compromise the effectiveness of USCIS' current fraud detection measures. The proposed rule is simply unnecessary and confers minimal, if any, benefit for the government, while punishing survivors who already endure chronic economic instability and for which taxpayers and communities ultimately pay the price. **We urge DHS to abandon the proposed rule and maintain the current 30-day regulatory timeframe for initial asylum seeker EAD processing.**

We look forward to your detailed feedback on these comments, and please contact me at [irenas@tahirih.org](mailto:irenas@tahirih.org) or 571-282-6180 for additional information.

Respectfully,



Irena Sullivan  
Senior Immigration Policy Counsel

\*Pseudonym

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<sup>i</sup> <https://www.govinfo.gov/content/pkg/FR-2019-09-09/pdf/2019-19125.pdf>

<sup>ii</sup> 8 CFR 208.7(a)(1).

<sup>iii</sup> NPRM at p. 47166-47167.

<sup>iv</sup> Less than 3% of families without lawyers succeed in winning asylum throughout the country.

<sup>v</sup> See, e.g., Postmus, J. L., Plummer, S. B., McMahon, S., Murshid, N. S., & and Mi Sung Kim, M. S. (2012). Understanding economic abuse in the lives of survivors. *Journal of Interpersonal Violence*, 27(3), 411–430, Adams, A, Sullivan, C, Bybee, D, & Greeson, M. (2008), Development of the scale of economic abuse. *Violence Against Women*, 13, 563-588.

<sup>vi</sup> The Mary Kay Foundation. (2012). 2012 Mary Kay Truth About Abuse Survey Report available at: <http://content2.marykayintouch.com/Public/MKACF/Documents/2012survey.pdf>



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-89wk <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1990

Comment Submitted by Janet Goepfert

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## Submitter Information

**Name:** Janet Goepfert

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## General Comment

Do something right for America, support our President and support the safety of American's!!!

AR003714

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-mag5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1991

Comment Submitted by James Hinton

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## Submitter Information

**Name:** James Hinton

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## General Comment

Don't you think it's time you so called politicians and DC to pull your head out of your ass and start looking out for the American people and not the illegals coming across the border

AR003715

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-9r3g
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1992

Comment Submitted by Nancy Hartwell

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## Submitter Information

**Name:** Nancy Hartwell

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## General Comment

It's time to support President Trump and his immigration reforms. President Trump is trying to make our country safe for all Americans. His reforms are very important and need to be passed now!!

AR003716

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-mao6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1993

Comment Submitted by Elaine Post

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## Submitter Information

**Name:** Elaine Post

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## General Comment

Washington support President trumps immigration reforms. Thank you very much

AR003717

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-n771
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1994

Comment Submitted by Steve Miller

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## Submitter Information

**Name:** Steve Miller

**Address:**

10607 se 27th pl  
Bellevue, WA, 98004

**Email:** Ssmiller@cmlseattle.com

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## General Comment

I oppose changing the requirement that employment authorization documents be quickly processed for asylum applicants. Having represented on a mostly pro bono basis asylum applicants for the last 30 years, I Have found that many of the most deserving asylum applicants are those with the fewest resources. They truly often escaped with only themselves and potentially a few members of the family. Because of the threat they were not able to bring or maybe never had material resourcesAlready they must wait 150 days past the filing of the ssylum application before they may apply for a work permit. By this time the little resources they may have had have been exhausted and they are desperate for the ability to work. Adding more months to the still life is cruel and unnecessary. These permits should be expedited as a matter of course. They were already submitted an asylum application and security checks can and should have been run. Delaying the work permit for many more months does not provide any deterrence to asylum applicants.If asylum processing were more efficient and speedy these questions would be removed. But the USCIS processes seem to be going slower and slower. For this problem we should not be punishing asylum applicants. This proposal conflicts with statutory and treaty requirements.

AR003718

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-vr9n
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1995

Comment Submitted by Anita Purcell

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## Submitter Information

**Name:** Anita Purcell

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## General Comment

As a result of this campaign of letting letting everyone into the country, our streets are less safe, the police tell me that anytime they see an unregistered car, or anyone is driving crazy, they say to themselves, "Where in heck are we going to find an interpreter at this time of night." And police also can't do their jobs, which is to protect the citizenry of the country! I NEVER leave my home without pepper spray!

AR003719

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-8w6o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1996

Comment Submitted by Tom Johnson

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## Submitter Information

**Name:** Tom Johnson

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## General Comment

In this day and age vetting incoming emigrants is more important than ever. The safety of the American people is paramount and it is ridiculous to put a 30 day timeline on the vetting process when in reality it could take up to six months or longer depending on the individual seeking entry into our country.

AR003720

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-wzqk <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1997

Comment Submitted by Patrick Sidener

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## Submitter Information

**Name:** PATRICK SIDENER

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## General Comment

Please Please Please support the President's Immigration Reform!

AR003721



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-dlxm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1998

Comment Submitted by Helen Mathewson

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## Submitter Information

**Name:** Helen Mathewson

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## General Comment

Stop obstructing President Trump from doing his job . We are sick of the Democrats behaving like children. Do your job. The work that the Citizens of the US elected you to do.

AR003722

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-ma0v
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-1999

Comment Submitted by Erin Richards-Wilhelm

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## Submitter Information

**Name:** Erin Richards-Wilhelm

**Address:**

PO Box 3200

Glenwood Springs, 81602

**Email:** erin@richardslawofficegws.com

**Phone:** 9704561922

**Fax:** 9704441107

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## General Comment

My name is Erin Richards-Wilhelm, and I am a solo practitioner of immigration law in western Colorado. I have been working with asylum seekers since 2011 and I have seen first-hand the damage that withholding work authorization from asylum seekers can do.

Currently, asylum seekers have to wait a half of a year to get work authorization. This causes them to live longer in poverty, thereby creating greater need for benefits, which they are entitled to because they are refugees. This increases the money we spend on them at a later date. If the 30 day deadline to process an EAD is extended, asylum-seekers will have to wait longer, causing them to fall further into poverty, and to suffer more food instability, housing instability, and therefore familial instability. These instabilities can cause lasting, possibly permanent, health issues. This will make this population even more vulnerable. The population is already vulnerable due to the mental, psychological, and physical harm that they have suffered in their home countries. USCIS estimates that asylum applicants will lose incomes of between \$255.88 million to \$776.76 million per year. This loss of income will cause asylum seekers, who arrive in the US as part of a population vulnerable to trafficking exploitation, crime, and mental health harm, will suffer further and become even more vulnerable.

It also decreases the taxes that these asylum seekers pay into our government coffers. USCIS has stated that, if this rule changes, they expect a loss of tax incomes of between \$39.15 million to \$118.54 million. This is tax income that we could be using to fund road projects, schools, and other public services that greatly need additional funding in order to ensure that America has a bright future.

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Paired together, these two guaranteed outcomes will result in not only lost taxes paid in, but additional emergency medicaid and other benefits paid out. This means not only a loss of tax income to the government, but also increased expenditures, raising the national debt and/or the annual national deficit spending. This money earned from the tax income, and saved by paying out less in public benefits, could be used to decrease our deficit spending or the national debt, or to fund infrastructure projects, education, additional border protections, the military, medicare and medicaid to US citizens, and many other government-funded projects, benefits, and protections.

Taking away the ability to work, earn their own taxable income, and pay taxes and for their own daily needs is actually contrary to the national security concerns that the Administration seeks to allay by changing this rule. Refugees will continue to come to the US regardless of whether they will get a work permit or not. But if they have a work permit, they are living out of the shadows. This means that they will get a driver's license and a social security card. This ensures that there is a record of the people, where they live, and where they work. This increases the chances that they will conform to our laws and not commit crimes.

Instead of extending the amount of time to process an EAD based on pending I-589, consider allowing asylum-seekers to file their 765 60 days ahead of the 180 clock period. Currently, they can file their 765 when their asylum application has been pending 150 days. Increase the deadline to process the 765 to 60 days, and allow asylum seekers to file their 765 after the 589 has been pending 120 days. This will give USCIS more time to ensure that security checks are completed properly, and it will also ensure that asylum-seekers will have an EAD so that they can live in the open, be registered in the community to ensure public safety, and work above-the-table so that they are paying into the national and state tax coffers.

Thank you for your time and for taking my thoughts into consideration.

[Comments]: [See sample arguments to the left.]

[If applicable, include a personal story of your experience as an asylum seeker, someone who works with asylum seekers, your concerns about impact, etc.]

AR003724

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2000

Comment Submitted by Greg Short

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## Submitter Information

**Name:** Greg Short

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## General Comment

Regarding the 30-day time limit for background checks on Asylum Seekers eyes feel the 30-day time limit is restrictive and inappropriate. Background checks on Asylum Seekers should take as much time that is needed to make sure their claims for Asylum are accurate.

AR003725

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-2czq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2001

Comment Submitted by Oudrey Wilson

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## Submitter Information

**Name:** Oudrey Wilson

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## General Comment

The GOP keeps backing off from the LEFT, for a LOT of years. Need to replace McConnell. This is WHY the GOP lost the House.

AR003726

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-acf0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2002

Comment Submitted by Michael Bertisch

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## Submitter Information

**Name:** Michael Bertisch

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## General Comment

Permitting asylum seekers to enter is founding principle of the United States, whose founding fathers sought a better life in the New World and, ultimately, succeeded in divorcing themselves from political oppression and persecution at the hands of a foreign power.

The proposed regulation is ill-advised on humanitarian, economic and public safety grounds. Asylum applicants must already wait 150 days before applying for employment authorization. Eliminating the 30-day adjudication rule would needlessly delay essential benefits to this class of immigrants and limit their ability to provide for themselves. By USCIS's own account, it would also result in the loss of substantial tax revenue. The proposed rule also raises public safety concerns. The public is served when they can be lawfully and gainfully employed, and the rule would create an environment where workers can be taken advantage of and even abused and wages - including wages for US citizens - are depressed.

Furthermore, in many markets and in many industries the US is facing a labor shortage that is prevent our ability to fully realize the economic expansion we would otherwise be able to achieve with more labor. Now is not the time to keep able bodied bona fide asylum seekers out of the workforce.

I therefore OPPOSE the proposed rule.

AR003727

# PUBLIC SUBMISSION

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<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-8sq5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2003

Comment Submitted by Patricia Williams

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## Submitter Information

**Name:** Patricia Williams

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## General Comment

Your attention to the border issue is going to backfire against you if you get a President in office. You will have to clean up the mess you allowed to happen while dealing with the drugs and crime you encouraged to cross the border.

AR003728

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-nlaw
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2004

Comment Submitted by Matthew Burian

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## Submitter Information

**Name:** Matthew Burian

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## General Comment

My name is Matthew. I work at a law firm in Minneapolis, Minnesota as a legal assistant. As such, I am very familiar with USCIS and the asylum process. I have worked with and gotten to know many asylum seekers during my time as a legal assistant, as well as many other people seeking to be here in the United States legally.

I have been very dismayed by the changes Donald Trump has made to the immigration system, changes that are rooted in ignorance, misinformation, prejudice, racism, and malice. Revocation of the 30-day processing provision for asylum applicants is just another example of the absurd and cruel policies proposed under this administration.

Working with asylum seekers is always a heart-wrenching experience. I hear their stories, stories of fear, violence, and desperation. These people have risked a great deal to come to the United States in the hopes of finding safety, knowing that if they stay in their home country, they will likely face rape, torture, and death.

It is important to remember that asylum seekers are here legally. They are exercising their legal right to apply for asylum. While they are here, they need to be able to support themselves, just like everyone else. Delaying the emission of the employment authorization will only make it harder for them to survive. They will struggle to access food, housing, and medicine. They will be vulnerable to violence and exploitation. Whatever people may think of their reasons for being here, they are people, and they deserve better.

It is not a hardship of USCIS to adjudicate their applications for employment authorization within 30 days. In fact, it is clear that it is to their BENEFIT and to the benefit of the country for them to do so. We are losing tax revenue when asylum seekers cannot work legally, close to \$100 million a year, in fact.

There is no downside to the policy as it is! There is no reason to change this policy except to discourage people from seeking asylum. People often complain about illegal immigration. They say that people should come here legally and wait in line (as if there actually is a line!). But how are people supposed to come here legally if there

AR003729



is no legal option for them? If you want to discourage illegal immigration, then open the doors to more legal immigration. Make the rules fair and reasonable, so that people actually have a way to come in and get status. The proposed policy change will only make matters worse for everybody.

AR003730

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-oy84 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2005

Comment Submitted by Sarah Collie

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## Submitter Information

**Name:** Sarah Collie

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## General Comment

Please support President Trump's immigration reforms. These reforms are needed to protect American citizens from people entering the country for the wrong reasons, endangering lives. We have made it too easy for illegal immigrants to enter our country and changes must be made to these laws.

AR003731

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2006

Comment Submitted by Richard Schaefer

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## Submitter Information

**Name:** Richard Schaefer

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## General Comment

I support POTUS immigration reforms.

Do not put artificial limits on the time needed to check the status of those coming into our country. You can set a GOAL and ask them to report back how they are doing relative to the goal.

I look forward when we can get the WALL behind us and start talking about the GREAT DOOR we have for those that want to enter the country legally, for both temporary and permanent stays,

AR003732

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2007

Comment Submitted by Tom Craig

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## Submitter Information

**Name:** Tom Craig

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## General Comment

We urge you to support President Trump in his efforts to secure and protect us from unwanted illegal immigrants. We need to be diligent as to who we allow access into our nation even more so now with terrorists on the lose. I just heard about the family who was attacked by cartel on the border. This needs to stop and stop now.

Thank you for your time.

AR003733

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-uhmi <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2008

Comment Submitted by Gary Thompson

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## Submitter Information

**Name:** Gary Thompson

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## General Comment

As an American, I am appalled by the lack of action/s on behalf of the American people with regard to Immigration Reform. Is it not well past time for you people to stop your damn lobbying and playing political games?? I stand behind our Great President and I DEMAND you stop the political bullying being done to Pres. Trump just because he embarrassed the DemonRATS, who endorsed America's WORST TRAITOR EVER, Hillary(KILLARY) Clinton!!! Get off your LAZY BUTTS and do your damn jobs!! So sorry I held back my true emotions!!!

AR003734

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-89wk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2009

Comment Submitted by Rick Quann

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## Submitter Information

**Name:** Rick Quann

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## General Comment

Please do the right thing and remove the time line restrictions. Furthermore, close the boarder and stabilize our country. We dont need additional laws to control the borders use what we have and do it right!

AR003735

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-a5ms
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2010

Comment Submitted by Myrna Feinbloom

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## Submitter Information

**Name:** Myrna Feinbloom

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## General Comment

As a concerned citizen, I must urge you to hold in force the 30 day adjudication rule. Immigrants already have to wait 150 days to apply for work permission. What good would come from having people who WANT to work, who need to work to support themselves and their families, and who can then pay taxes to the community, being prevented from so doing? Certainly having people gainfully employed contributes to the public good. It would be inhumane and both socially and economically irresponsible to unnecessarily delay an immigrants ability to work.

Myrna Feinbloom

Manhasset, New York

AR003736

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-qgt2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2011

Comment Submitted by Rosetta Leach

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## Submitter Information

**Name:** Rosetta Leach

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## General Comment

Please do all you can to keep America safe from all the immigration enemies of America.

AR003737



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-fsvd
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2012

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This is one of the changes in asylum law that shows that cruelty is the point in this administration's treatment of asylum seekers. Delaying their ability to work, obtain a SSN and ID, access health care, and generally be able to support themselves and their families and lead a normal life, while also causing millions of dollars to be lost in tax revenue, makes no sense from a policy perspective. USCIS is currently processing 99% of these applications within the court-ordered 30-day deadline so USCIS clearly has the capacity to meet this deadline. If USCIS needs more time to vet the applicants, it could allow asylum seekers to apply earlier than the current 150-day requirement.

AR003738

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-o4sk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2013

Comment Submitted by Alan Byrd

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## Submitter Information

**Name:** Alan Byrd

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## General Comment

I want congress to support President Trumps Immigration Reforms, which is needed to protect American Jobs and American Citizens.

AR003739

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-9ccq
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2014

Comment Submitted by Danielle Krumholz

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## Submitter Information

**Name:** Danielle Krumholz

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## General Comment

I am an immigration attorney. This rule would cause harm to asylum seekers and cost the government money by loss of tax revenue. Asylum seekers need to be able to work to support themselves while their asylum petitions are pending. This rule would make it harder for them to do so. Also, USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

AR003740

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-gcd5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2015

Comment Submitted by James Burghard

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## Submitter Information

**Name:** James Burghard

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## General Comment

Stop playing the impeachment proceedings and get down to governing. We never thought the Democratic Party would steep this low. It is not the party of my parents. Nor of free will thinking people! Degrading of America, NO!!

AR003741

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-y35w <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2016

Comment Submitted by Steve Grimes

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## Submitter Information

**Name:** Steve Grimes

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## General Comment

Please allow the Trump Administration the time needed to adequately and thoroughly perform complete background checks on all asylum seekers into the U.S.  
Thank you in advance.

AR003742

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-illl <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2017

Comment Submitted by Carrie Jackson

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## Submitter Information

**Name:** Carrie Jackson

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## General Comment

STOP the insanity!!! President Trump's Immigration Reforms are better than ANY illegal alien deserves! The real solution would be to close our borders completely. Let all the background checks and security investigations be conducted while the illegal aliens are OUTSIDE our borders!

AR003743

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-s3qn
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2018

Comment Submitted by Michael Castle

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## Submitter Information

**Name:** Michael Castle

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## General Comment

it's time to forget your commitment to your party and vote with your heart for the people that put you in office and vote yes to these policies that help the American citizens. T he ones paying your salary.

AR003744

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-79ty <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2019

Comment Submitted by Kevin Miller

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## Submitter Information

**Name:** kevin miller

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## General Comment

Washington get moving, Americans are sick and tired of the games and nonsense. Do something for the good of our country for once!!!!!!!!!!!!!!!!!!!!!!

AR003745



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-b3li
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2020

Comment Submitted by E Williams

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## Submitter Information

**Name:** E Williams

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## General Comment

This proposed rule will harm asylum seekers and their families. By efficiently processing work authorization we are ensuring that adults will have the ability to support their families and contribute to the tax base during the period of time that they are required to be in the United States while pursuing their asylum case. By delaying approval of work authorization we are not only greatly harming the asylum seeker and their family, but we are hurting the local economies and the ability to generate revenue.

AR003746

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-akfe
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2021

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the elimination of the 30 day asylum EAD deadline. I work with asylum seekers and have seen first hand how important an EAD is. Through not fault of their own, asylum seekers have to wait over 180 days to have their asylum cases adjudicated. That means that asylum seekers need the right to work legally. The reasons are simple: without an EAD an asylum seeker cannot work, obtain a SS number, or obtain state identification. Asylum seekers are among the most vulnerable and taking away the right to an EAD would make them more vulnerable. That is not the America that I know. Additionally, I'm concerned that the intent of this rule is to persuade persons not to seek refuge or punish those that do. Again, that is not the America that I know. America is better when we take these people and use them to our advantage, i.e., provide them an EAD when they're applications have been prolonged due to no fault of their own and allow them to provide for themselves and directly or indirectly provide for the USA.

AR003747

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-h98i
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2022

Comment Submitted by Dennis Krug

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## Submitter Information

**Name:** Dennis Krug

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## General Comment

Get out of the way and allow President Trump protect the security of this country with his immigration reforms !

AR003748

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-daoq <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2023

Comment Submitted by Connie Shaboo

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## Submitter Information

**Name:** Connie Shaboo

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## General Comment

I support President Donald Trump and his administration.

AR003749

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-8g6z
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2024

Comment Submitted by Delia Seeberg

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## Submitter Information

**Name:** Delia Seeberg

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## General Comment

I have worked with immigrants, refugees, and asylum seekers for 30 years. I can safely say that none of the people I've worked with have wanted to take advantage of the U.S., and all of them have wanted to work and simply create better lives for themselves and their families.

Regarding asylum seekers, if this proposed rule is approved, asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

AR003750

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-mp15
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2025

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Asylum seekers need to be able to work to support themselves. Hurdles to legal work only makes them more dependent on handouts, which nobody wants. The legal fees required to fight an asylum case are high, and not allowing applicants to work seems to be cruelly aiming to decrease their ability to win their asylum case. Why would anyone think this is a good idea?!? The asylum process is an internationally recognized legal system, and the people are trying to follow the rules. Taking away legal options for them to work will likely just push people into working illegally. If the idea is that people should do things the "right way", the legal way, why are we considering taking away those pathways?!?

AR003751

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-sa9f <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2026

Comment Submitted by Gayle Keeling

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## Submitter Information

**Name:** Gayle Keeling

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## General Comment

Please support Pres. Trump.

AR003752

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-m4a2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2027

Comment Submitted by Mark Garcia

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## Submitter Information

**Name:** Mark Garcia

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## General Comment

Please start supporting President Trump and putting legal citizens of the United States first.

Thank you for your time.

AR003753



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6l-qnbv <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2028

Comment Submitted by Terry Cuthbertson

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## Submitter Information

**Name:** TERRY CUTHBERTSON

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## General Comment

Get all the leftist out of Washington !!!!!!!!!!!

AR003754

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-idfl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2029

Comment Submitted by Aimee Deverall

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## Submitter Information

**Name:** Aimee Deverall

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## General Comment

I am an immigration attorney, and I implore you to allow asylum seekers to work. Many of my clients are single mothers with children. They arrive out of desperation, with very few resources. The ability to obtain work authorization allows them to earn a living to support their family and a driver's license so they can get to work and take their children to school. Eliminating the 30-day deadline for work permits will be devastating to these people and have devastating effects on our communities. Again, many of these people are mothers and families with small children. Their inability to obtain work authorization to support their families will affect their children, the schools they are enrolled in, and the communities where they live. Most of my clients have suffered severe trauma before they arrive in the United States, and they require counseling to cope and prepare their immigration cases. Having a driver's license allows them to get to these services, which are not always close by, and having work authorization gives them the ability to pay.

AR003755

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-e0hz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2030

Comment Submitted by Richard Cyr

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## Submitter Information

**Name:** Richard Cyr

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## General Comment

Follow current immigration laws and if you don't like them get off your duff and change them.

AR003756

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-mm6b
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2031

Comment Submitted by Douglas Milby

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## Submitter Information

**Name:** Douglas Milby

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## General Comment

Secure our borders first before passing any other legislation

AR003757

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-coto
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2032

Comment Submitted by Ed Robbins

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## Submitter Information

**Name:** Ed Robbins

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## General Comment

America has been great because of the Constitution and the rules that we have followed. Why are people trying to change these rules and ruin America? I won't be voting for them.

AR003758

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-amix
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2033

Comment Submitted by Joni Brooks

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## Submitter Information

**Name:** Joni Brooks

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## General Comment

Give the Trump Administration enough time to thoroughly check the background of every asylum seeker.....Please!!!! Stop the politics and do whats right for our country!!! This ridiculousness MUST stop!!!!

AR003759

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-l3or <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2034

Comment Submitted by Richard Skultety

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## Submitter Information

**Name:** Richard Skultety

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## General Comment

No Visa ,send them back across border . File for entry at a US Consulate . Vet them from there in a reasonable time . Cut the B.S.

AR003760

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-x2dv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2035

Comment Submitted by Suzanne Chupp

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## Submitter Information

**Name:** Suzanne Chupp

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## General Comment

Without a wall in tandem with strict scrutiny of those seeking asylum, we put our country at grave risk. There should not be any strict timeline when investigating those who claim they need asylum. Many should be refused and redirected to Mexico which was the first country they entered after "fleeing" their home country.

AR003761



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2036

Comment Submitted by Thomas Fugate

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## Submitter Information

**Name:** Thomas Fugate

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## General Comment

I support President Trump and his efforts to reform our immigration system. Use your best efforts to see that this is accomplished.

AR003762

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-e1xb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2037

Comment Submitted by Jan Pederson

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## Submitter Information

**Name:** Jan Pederson

**Address:**

1300 Crystal Drive  
Arlington, VA, 22202

**Email:** jan@maggio-kattar.com

**Phone:** 2022564989

**Fax:** 2024836801

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## General Comment

I have been practicing immigration law for over forty years and have had the privilege of representing thousands of both refugees outside the United States and asylum applicants who are inside the United States. I have taken refugees into my home and helped them until they could find work. Many of my clients are now physicians, lawyers and leaders of multi-national companies and have contributed much to America. I represent only those whose cases I believe are approvable and virtually all my cases have been approved. Immigration lawyers as a whole are of great integrity and accept cases which they believe are approvable. To suggest that asylum applicants game the system is an insult to the refugees fleeing persecution, the lawyers who represent them and the USCIS officers who review their cases. Refugees are the most vulnerable amongst us and want and need to work to be self-sufficient and to contribute to America.

We used to have asylum interviews the day of filing and work permits were granted to meritorious applicants. This was the system in effect until 1995. Concerns about frivolous asylum applicants obtaining work permits is valid in only a tiny percentage of cases. To harm all applicants by restricting work permission any further than it is currently restricted is adding to the misery of the most vulnerable amongst us with no countervailing benefit to the to government. At the very least, continue the thirty day processing rule. The only change I would advocate is to grant work permission on filing the asylum application and to interview asylum applicants within sixty days. That would resolve all doubts about whether undeserving applicants are obtaining work permission.

Thank you for the opportunity to comment.

AR003763



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-nwum <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2038

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Please DO NOT remove the 30-day deadline for USCIS to process work authorization applications. Asylum seekers come to the U.S. legally. If allowed to work, as our current law provides for, they can add to our economy and pay taxes and support themselves. If the processing deadline is removed, the wait for work documents could become interminable and asylum seekers would risk homelessness, food insecurity, trafficking.

AR003765

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-io7m
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2039

Comment Submitted by Bill Uhrig

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## Submitter Information

**Name:** Bill Uhrig

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## General Comment

The arbitrary timeline to approve asylum seekers must be extended to allow proper safe screening. Making a short window invites dangerous people to sneak in. The short time is stupid. Who does it benefit? Not Americans.

AR003766

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-r29n
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2040

Comment Submitted by Don Allen

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## Submitter Information

**Name:** Don Allen

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## General Comment

TO Whom it May Concern: Please take time and change LAW TO ALLOW PROTECTION FROM Aliens entering the USA without proper checks.

AR003767

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-zc78
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2041

Comment Submitted by David Missey

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## Submitter Information

**Name:** David Missey

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## General Comment

There is no way we (AMERICA) can afford to RUSH through Illegal people. We need a thorough check, in detail. More than usual, as so many evil people tried to sneak in because of a ineffective left government who should be fired and pay back there income, as they are NOT doing the job required. There on a ghost chase, and make up false accusations. Sick of it.

AR003768

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-okz8 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2042

Comment Submitted by Michael Kennedy

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## Submitter Information

**Name:** Michael Kennedy

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## General Comment

I am writing because I am concerned about our southern border. Please stop the bickering and get something done.

AR003769



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6i-c6ke
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2043

Comment Submitted by Joshua Osborne

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## Submitter Information

**Name:** Joshua Osborne

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## General Comment

We desperately need to secure our borders and be sure we know whos coming in to live here! We need to stop cutting corners on background checks and stop diverting valuable resources to immigrants who DO come here legally!! Please support President Trumps immigration reform!!!

AR003770

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-92p4 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2044

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Do not remove the 30-day processing provision!!!!!!!!!!

AR003771

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6l-smiv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2045

Comment Submitted by Quentin Joinson

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## Submitter Information

**Name:** quentin joinson

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## General Comment

Every asylum seeker needs to be properly vetted for the safety of all our citizens. No one should just be able to walk on through, although without proper funding, the border agents are overwhelmed for lack of manpower.

AR003772

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-iehk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2046

Comment Submitted by Karen Carroll

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## Submitter Information

**Name:** Karen Carroll

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## General Comment

please give President Trump support the United States of America,President Trump and the Citizens of The USA the time needed to solve the immigration problems.  
Thank you for your consideration.

AR003773

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6k-t3yx <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2047

Comment Submitted by Sharene Miller

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## Submitter Information

**Name:** Sharene Miller

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## General Comment

Please protect this country by supporting President Trump's immigration reforms.

AR003774

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-wggv <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2048

Comment Submitted by Hanne Sandison

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## Submitter Information

**Name:** Hanne Sandison

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## General Comment

Elimination of the 30 day rule has no positive benefit in any sense and is beyond comprehension. It will do untold damage to people pursuing their legal right to seek asylum and will result in millions of dollars of lost wages and tax revenue. Its bad for asylum seekers and bad for U.S. citizens, and it promotes the exploitation of vulnerable workers.

AR003775

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6j-gv37
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2049

Comment Submitted by Bryan Huckabee

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## Submitter Information

**Name:** Bryan Huckabee

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## General Comment

Please support President Trumps reforms so that this country can get back to being the great country that it always has been. Thanks for your time

AR003776

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-3wos
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2050

Comment Submitted by Meldonna Cody

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## Submitter Information

**Name:** Meldonna Cody

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## General Comment

Please do NOT support reducing the time to verify the background and validity of asylum seekers. As a world traveler myself, I know other countries have much higher standards. Lowering those of the USA is not the way to protect our own citizens, nor is it a good way to protect the validity of genuine asylum seekers.

AR003777



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6j-vabb <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2051

Comment Submitted by Joya DeGregorio

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## Submitter Information

**Name:** Joya DeGregorio

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## General Comment

Support the Presidents immigration reforms NOW. We have had enough time and energy wasted on the phony, bogus impeachment garbage. Do something productive for our country, for a change.

AR003778

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-pon5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2052

Comment Submitted by Diana Woolnough

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## Submitter Information

**Name:** Diana Woolnough

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## General Comment

I am reaching out to you, regarding the time limit that the democrats are trying to impose on OUR government in regards to asylum seeks. They absolutely need enough time to thoroughly vet each person. Other wise what is the use. Please "STOP" putting up road blocks to everything OUR PRESIDENT is trying to accomplish , simply because you don't like the chose "AMERICA" made. He is trying to keep America safe.

AR003779

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6k-kmo6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2053

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Keep in mind- the sooner they get work permission, the sooner they pay income taxes and we want their taxes!

AR003780

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6i-oah2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2054

Comment Submitted by Kathleen Fricano

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## Submitter Information

**Name:** Kathleen Fricano

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## General Comment

Remove timeline for safety of USA!!!

AR003781

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-z25i
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2055

Comment Submitted by Claire Valentin

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## Submitter Information

**Name:** Claire Valentin

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## General Comment

I am writing as a private citizen and attorney, who has represented asylum seekers in the past. One of my clients was a fifteen year old victim of the worst form of female genital mutilation. She traveled to the United States on a scholarship to attend a leadership camp. She opposed the practice of FGM but her grandmother was known in her community for performing the circumcision ceremony, and it was expected that my client take over that role. She could not bear the thought. She missed her mother but was filled with panic at the thought of returning to her country. She sought asylum as was her right under the law. She was a minor, in a foreign land, without her parents or family, still struggling to recover from the trauma of what had been done to her against her will. She struggled to keep her head above water. She knew she had to finish her education. So she WORKED to support herself while finishing high school.

If she had not been able to secure her work permit quickly, she would have necessarily had to rely on charitable donations and the very few public benefits available to asylum seekers. She likely would have been homeless, hungry, and in need of basic provisions like clothes. She likely would have had to work illegally to survive securing jobs with no worker protection or flexibility that undermine working conditions for everyone and so would have been unable to finish high school. Upon a grant of asylum, she would have been far more reliant on our public welfare system.

Because our asylum process is so backlogged, it took a couple years before her application was granted, but it was granted. Shes now a mother, high school graduate, a college student, an employed, contributing member of her community. She pays her bills and her way. She could not have done that if shed not been given the tools to become self-reliant quickly upon her arrival. If anything, the government should be providing work authorization immediately and for longer periods than the current one-year period. A lot of time, effort, and money could be saved by granting two or three year authorizations. This proposed regulation will not stop asylum seekers, who fear for their lives and safety, from seeking a better life; it will only make it harder from them to secure that better life for themselves, at the expense of all of us.

AR003782

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6s-w4p6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2056

Comment Submitted by Debbi Penir

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## Submitter Information

**Name:** Debbi Penir

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## General Comment

Please support the Presidents immigration reforms! It really is what we Americans need and want. Thank you!

AR003783

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d73-4gvs <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2057

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Asylum seekers arrive in the US to escape the violence in their country. They seek to become independent and hope for the Government in this country to protect them and support them unlike the Government in their home country. Not approving employment authorization for them in a timely manner does not allow them to get on their feet and does not show the support from the Government they so desperately need.

AR003784

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-uxtk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2058

Comment Submitted by Erica Lawrence

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## Submitter Information

**Name:** Erica Lawrence

**Address:**

28262 Calaveras Lake Drive  
Spring, 77386

**Email:** eaglawrence@gmail.com

**Phone:** 361-443-6052

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## General Comment

Good morning!

My name is Erica Lawrence. I am native Texan, mother of 4 children under the age of 12, and concerned citizen. I am emailing and commenting on the proposal to eliminate the 30-day processing regulation for initial asylum work permits.

I oppose. Asylum seekers have needs like the rest of us; they must be able to work to eat, pay rent, and to be productive while waiting their turn for legal action. This proposed rule will harm asylum seekers and their families, and will lead to millions of lost tax revenue.

I ask you to reconsider this proposal. Im sure there are other alternatives for common ground and common sense reform.

Thank you for your time.

AR003785



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-gl1h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2059

Comment Submitted by Hilkka Buckinger

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## Submitter Information

**Name:** Hilkka Buckinger

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## General Comment

I have been shocked to learn that the authorities only have 30 days to review the background of asylum seekers to the USA. In practice, this must mean that no or very little background check is done of lots of people trying to get into the US, this also meaning that lots of people with extremist views and motives, or just plain liars may get to stay in the country.

Such 30-day rule must take enormous resources from those cases in which one would think persons have every right to have their cases reviewed quickly.

My husband and I are some of those persons. We are senior citizens, got married in May 2017 in Sweden (I have Finnish passport though), he submitted petition for me in August 2017, and I did not get invitation to interview in Stockholm and my immigration visa before November 2018!!! As we followed the advice not to sell my apartment in Sweden till I got my greencard, which ended up taking nine months, I could not move permanently to my husband before October 2019! Almost 2.5 years wasted time for us who are over 60 years old, and wasted time when it comes for me - due to not knowing when our case would proceed - not being able to take a permanent job in Denmark or Sweden (I was pushed out of my permanent job in Copenhagen, as the employer expected me to move to the US sooner.) And wasted time when it comes to me getting a job in the USA and being able to contribute to paying for our house in Oklahoma (that we have owned jointly since June 2017), wasted time when it comes to me saving for retirement, wasted time for the USA getting the advantage of me as very skilled and experienced workforce, and the list could go on.

People who are truly persecuted in their home countries e.g. for their faith must get protection. But that they must get their cases reviewed and background checked within 30 days sounds like a totally artificial deadline for me. (Neither am I in favor of that cases should take several years, as sometimes is the case in e.g. Denmark this is devastating for families and not least children waiting for decisions and not being able to get on with their lives.)

I urge USCIS to go away from a 30-day rule and give a high priority e.g. (1) to cases where persecution and/or death would be obvious consequences if a person is sent back to their home country, and (2) cases like ours, where two people (especially in high age) get married with very obviously no false motives or need to move to the US (as e.g. someone like me with a Finnish passport), and with an obvious motive only to live together with his or her spouse.

AR003786

(One last comment: I am certain that in some cases, USCIS handling times being very long for petitions for spouses from other countries has a cost of some marriages breaking. I personally know about one such case, where the marriage ended up breaking, as the couple were not able to meet for one year while waiting. This specific couple had been married and had lived together for several years in Finland. This must have had a cost even for the child involved. As I see it, such a case should have been decided upon within one to three months.)

AR003787

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2060

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

**Address:**

9706 Springwater Ct.

Louisville, KY, 40229

**Email:** melanie.jones598@gmail.com

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## General Comment

Please don't make asylum seekers go without employment authorization. It is already complicated enough with the asylum clock rules. If they are here lawfully requesting asylum, why can they not lawfully work while waiting for their case to be heard and adjudicated? They are already here out of fear for their lives in their home countries. People deserve to feel safe, and part of feeling safe is financial stability. They need to be able to work and support themselves and their families, and they need that as soon as possible. This proposal is cruel and lacks empathy, as do many of the comments I'm reading.

AR003788

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2061

Comment Submitted by James Lutterloh

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## Submitter Information

**Name:** JAMES LUTTERLOH

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## General Comment

WHY DON'T YOU ANTI- AMERICAN POLITITIONS GET OFF YOUR LEFTIST LEANINGS AND DO SOMETHING FOR AMERICA?SUPPORT PRES TRUMP WITH HIS IMMIGRATION REFORMS.

AR003789

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2062

Comment Submitted by Clinton Hodges

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## Submitter Information

**Name:** clinton hodges

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## General Comment

They need to support our borders with sttricker laws with no time limits.

AR003790

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2063

Comment Submitted by Kate Vickery

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## Submitter Information

**Name:** Kate Vickery

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## General Comment

In my experience helping to provide legal assistance to asylum seekers in the Houston region, I have seen first hand the importance of enabling families with pending asylum applications the ability to work as quickly as possible. Because a final decision in an asylum case can take years to adjudicate, families seeking refuge in the United States will be irreparably harmed if they are unable to get their EAD approved in a timely manner. Already, the 6 month waiting period before applying for an EAD is a burden. Families need to be able to make a living in the United States - and our economy has ample room and jobs for them - while they wade through the excruciatingly long process of having their cases adjudicated. Being able to work also makes it more likely that a family can afford an immigration attorney to help them with their case. As you are aware, having qualified counsel is the biggest factor in whether a person wins their asylum case (<https://www.americanimmigrationcouncil.org/research/access-counsel-immigration-court>). The lack of affordable legal counsel is the biggest barrier to having a lawyer and being able to work makes it much more likely that a family can hire an attorney. As importantly, it is inhumane to suggest that people who are going through the immigration process "the right way" (by legally seeking asylum) should be punished by removing access to a valid work permit while they move through the system. Reducing access to an EAD makes families more vulnerable to homelessness, food insecurity, and poor health. The impact will ultimately fall on our community at large. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year.

AR003791

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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2064

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This rule change, by the government's own admission, would cause a loss in tax revenue ranging from \$39.15 million to \$118.54 million each year. The laughable suggestion that this would be replaced by other workers receiving overtime pay or extra hours is unimpressive when most often, the jobs asylum seekers take are the lowest jobs available that most American workers do not wish to have and often refuse to accept. USCIS makes frequent reference to a rise in national security threats as a reason to spend more time and resources on adjudicating each EAD request. However, they have demonstrated that they are able to adequately process 99% of all EAD requests within the 30 day period within the last year. Their reasoning that they just don't want to, as stated in the proposed rule change, is not a convincing argument or reason for making such a drastic change that will affect so many lives. If they are truly concerned about having more time to process applications, they could still comply with the law and regulations by allowing asylum seekers to apply for an EAD 120 days after submitting an application rather than the current 150 days, therefore allowing USCIS a total of 60 days to properly process and vet applications.

AR003792

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2065

Comment Submitted by Vanessa Merton

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## Submitter Information

**Name:** Vanessa Merton

**Address:**

78 North Broadway  
White Plains, NY, 10603

**Phone:** 9144224333

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## General Comment

As someone who has worked with numerous asylum applicants, I know how eager they are to work and support themselves and their families by doing jobs like home care of the elderly, disabled, and children; all kinds of maintenance and home renovation work; and other difficult and dangerous jobs that native-born Americans will not do at the same low rates of compensation. It seems utterly asinine to not invest USCIS resources in processing employment authorizations as quickly as possible for people who want to work. This will generate tax payments and can help restore so many communities, like the multitude of dying, isolated Midwestern towns that have been completely re-invigorated by refugees and asylees who have settled in them. Also, we have a legal commitment under the 1950 Refugee Convention to refrain from criminalizing or punishing asylum-seekers and depriving them of the legal right and freedom to work is antithetical and repugnant to basic American values. Thank you for considering these points.

AR003793



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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2066

Comment Submitted by Donna Morelli, Central West Justice Center

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## Submitter Information

**Name:** Donna Morelli

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## General Comment

See attached file(s)

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## Attachments

Comment Letter

AR003794

# CENTRAL WEST JUSTICE CENTER

*An affiliate of Community Legal Aid*

**DONNA MORELLI**  
Staff Attorney  
dmorelli@cwjustice.org

152 NORTH STREET, SUITE E-135  
PITTSFIELD, MA 01201  
PHONE: (413) 686-9049  
FAX: (413) 448-2715

**OFFICES:**  
PITTSFIELD  
SPRINGFIELD  
WORCESTER

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
[20 Massachusetts Avenue NW](#)  
Mailstop #2140  
Washington, D.C. 20529-2140

DHS Docket No. USCIS-2018-0001  
84 F.R. 47148

November 8, 2019

To Whom It May Concern:

My name is Donna Morelli and I am a staff attorney in the immigration unit at Central West Justice Center. I respectfully submit this comment to the Department of Homeland Security's Notice of Proposed Rulemaking on Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

Central West Justice Center provides free civil legal assistance in the areas of employment rights, housing and homelessness, public benefits, and immigration to indigent people in Central and Western Massachusetts. Our immigration unit assists clients in obtaining humanitarian relief including asylum.

I submit these comments in opposition to the Proposed Rule "Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications" (Sep. 9, 2019), DHS Docket No. USCIS-2018-0001 (hereinafter, the Rule). The Rule would eliminate the requirement that DHS adjudicate initial requests for employment authorization by asylum applicants within 30-days of filing. The Rule would cause significant financial hardship to asylum applicants who are unable to work and to those who depend on them financially - destabilizing the financial (and therefore health, housing, etc.) situation of persons already traumatized by the threats and persecution that led them to apply for asylum.

I work in Central West Justice Center's Pittsfield office which is located in Berkshire County. While Berkshire County is known for its cultural attractions and natural beauty, it is also one of the most rural and poorest counties in Massachusetts. Indigent Berkshire County residents face

AR003795

significant hurdles in maintaining employment, housing, and other resources to survive. Public transportation is inadequate and essentially nonexistent in some towns. These issues affect both citizens and immigrant residents alike, including asylum applicants. Without an EAD and associated access to employment, asylum-seekers will have difficulty obtaining and maintaining basic services such as housing, food, and health care.

The Rule would burden and stretch the capacity of charities and non-profit service providers. If asylum-seekers are unable to obtain an EAD in a timely manner, they are forced to rely on other forms of support, including organizations that provide financial, housing, legal, or other forms of assistance. Furthermore, there are not as many of these resources in Berkshire County given its location in comparison to the rest of Massachusetts.

Moreover, the Rule is not in the economic interest of the United States which benefits greatly from the contributions of refugees and asylum seekers. It is unnecessary given that DHS has shown itself capable of near complete compliance with the 30-day adjudication requirement. DHS's argument that the proposed rule is due in part to fraud concerns is contradictory since DHS should want to expedite EAD determinations and quickly vet applications, as it currently does, to detect and investigate any concerns about applications rather than create extensive delays.

Thank you for your time and consideration regarding this matter. If you require further information, please do not hesitate to contact me at 413.686.9049.

Sincerely,

Donna Morelli  
Staff Attorney  
Central West Justice Center

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2067

Comment Submitted by Elaine Wilson

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## Submitter Information

**Name:** Elaine Wilson

**Address:**

9910 Hollow Glen Place

Silver Spring, 20910

**Email:** elaineswils@gmail.com

**Phone:** 7342762191

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## General Comment

I am writing as a member of the Sanctuary Task Force of Friends Meeting of Washington (Quakers). As a member of the Religious Society of Friends I believe in the human rights of all people and the fundamental truth that we should treat our neighbors as we ourselves would be treated. I also believe that we are asked to welcome the stranger to our midst and to give to them what we ourselves enjoy food, shelter, health care, education.

The proposed law will seriously affect all asylum seekers hoping to work to support themselves and their families.

The law will endanger their ability to find gainful employment. It will lead to food insecurity, burdening our public assistance programs. It will swell the problem of homelessness in our communities already an enormous challenge. And it will put these individuals at increased risk of exploitation and trafficking as they look to illegal sources of revenue to support themselves, thus not only jeopardizing their morale but burdening our communities with this scourge.

I believe we have a moral imperative to aid our neighbors to the best of our abilities.

Finally if these individuals cannot work, they cannot contribute to our economy in the form of taxes. This loss of revenue to the government alone should be a reason to speed the ability of asylum seekers to get gainful, legal employment.

AR003797

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-mljz
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2068

Comment Submitted by Christopher Kelley

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## Submitter Information

**Name:** Christopher Kelley

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## General Comment

Background checks are essential at our borders for ALL entrants.

The violence of the drug cartels, demonstrated this week, and the known violence of extremist jihadis, as well as other criminal factors, take time to uncover. A short, arbitrary window of a mere 30 days, often proves insufficient, when needed information must be gleaned meticulously from foreign sources, often chaotic. It is nonsense to let unvetted persons into the country when we face such imminent risks. The deaths of US citizens, peacefully going about their lives on their home turf, violently taken by illegal aliens, is UNACCEPTABLE!

AR003798

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<b>Tracking No.</b> 1k3-9d6t-9av3
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2069

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Just can't be done....  
Stop it

AR003799

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2070

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Of course they should be allowed to work so that they can support their families while cases are pending and they do not have depend of the american government system to support them i.e. food stamps, medicaid, etc. They need to pay taxes.

AR003800

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d71-doe1
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2071

Comment Submitted by Janis Roddy

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## Submitter Information

**Name:** Janis Roddy

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## General Comment

Offering the right to seek asylum is who we are as a nation. the current changing policies are clearly trying to make this process nearly impossible for desperate, good families and individuals. Allowing Asylum seekers to work benefits them, the communities they are living in and the country. We put them in an untenable situation otherwise where they are forced to work illegally to support themselves.

AR003801



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2072

Comment Submitted by John Paparo

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## Submitter Information

**Name:** John Paparo

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## General Comment

Stop the invasion or the people will be forced to do it!

AR003802

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2073

Comment Submitted by Elizabeth Parker

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## Submitter Information

**Name:** Elizabeth Parker

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## General Comment

Asylum seekers must be vetted and adequate time must be allowed for that. The safety of American citizens is and should be the most important part of this process.

AR003803

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Posted:</b> November 08, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2074

Comment Submitted by Jane Anonymous

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## Submitter Information

**Name:** Jane Anonymous

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## General Comment

I completely oppose this proposed rule because it is bad on so many levels!

It will cause harm to asylum seekers - - people who have already suffered oppression, abuse, and/or persecution. It will result in asylum seekers to lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation.

The US government will lose tax revenue - USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

It is part of a systematic effort to deter asylum seekers. This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin - we are better than this! By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

AR003804

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2075

Comment Submitted by Joseph Muller

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## Submitter Information

**Name:** Joseph Muller

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## General Comment

For more than 20 years, USCIS (and INS) have operated under regulations that require prompt adjudication of employment authorization for asylum applicants. These regulations were implemented because of the importance of allowing those with delayed applications for asylum, through no fault of their own, to work and support themselves in the United States.

It is vital to consider that most applicants for asylum are not necessarily permitted to work, and thus to support themselves and their families, for at least 150 days after submitting an asylum application. This means that the minimum amount of time that an applicant would be waiting for a work permit under current law and regulations is six months. Six months is an eternity for those waiting in a foreign country for their paperwork to be reviewed. It is especially callous to subject those who are fleeing persecution and claiming asylum to such a long wait. It virtually requires applicants for asylum to work without authorization merely to be able to feed themselves, unless they happen to have significant assets available to survive that time period. It is not in the interests of the United States to force asylees into poverty or unauthorized employment.

Now, the Trump Administration wants to allow itself to take even longer in providing asylees work authorization. That is inhumane, legally spurious, and unnecessary.

While USCIS no doubt faces numerous challenges associated with backlogs and workload, addressing those challenges is precisely the charge of the agency. Applicants for asylum, who are often impoverished and need to work, should in no way share the burden of a USCIS backlog. USCIS must meet this burden through other means. USCIS is funded by the fees charged to the applicants themselves, including asylum applicants filing for renewal of work permits. It is inexplicable that USCIS cannot coordinate, hire, and streamline processes such as getting a work permit. USCIS is able to allocate the fees it receives according to need and to raise those fees if necessary to fund its operations. Indeed, the reality is that USCIS has been able to promptly adjudicate work authorization applications since the *Rosario v. USCIS* court order. USCIS cannot shrug its shoulders and resign to longer and longer backlogs into perpetuity.

AR003805

It is unlawful for USCIS to make these unnecessary changes after more than two decades of operating under the 30-day processing time requirement. There are myriad changes that USCIS should and must consider in lieu of increasing processing times for applicants, such as streamlining application processing, permitting pre-filing of work authorization applications to avoid choke points, allowing online filing of the required forms, issuing work authorization documents that are in-line with the actual periods of time people are waiting for asylum interviews, and automation of the back-end processes required to produce employment authorization documents. These changes would in fact benefit all applicants, rather than prejudicing the most vulnerable ones.

It is erroneous for USCIS to suggest that the 180-day extensions of work authorization, which only some applicants receive, would alleviate the burden of waiting for initial work permits. They do not. Initial work permits are not eligible for automatic extensions. The greater hardship is on the initial applicants. Yet USCIS is proposing elimination of the 30-day processing requirement for all applicants, not just for renewals. That is unreasonable, arbitrary and capricious.

Recent processing time increases have shown that USCIS cannot be trusted to manage its workload and to ensure prompt processing of applications. Indeed, it is clear that USCIS is actively working to impose more and more burdens, without justification, effectively increasing its own processing times. Following elimination of the 90-day processing requirement for work permits, USCIS has increased processing times not only for those with automatic extensions but for all work permit applicants. If this change is implemented, it is quite likely that asylum applicants will regularly face more than a year of waiting from the date of submission of a work authorization application to the receipt of the work permit. Expecting asylees to wait more than a year for a work permit is absolutely unconscionable and would create tremendous suffering to tens of thousands of applicants and their families.

AR003806

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2076

Comment Submitted by Rachel Benedict

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## Submitter Information

**Name:** Rachel Benedict

**Address:**

189 Cambridge Street

3A

Cambridge, ME, 02141

**Email:** rachel@rachelbenedictlaw.com

**Phone:** 6175759705

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## General Comment

DHS Docket No. USCIS-2018-0001

Asylum seekers need work permits so that they can lawfully work and support themselves and their families. Even if you think that we should not continue to be a nation of immigrants--and that we should do everything in our power to literally starve asylum-seekers--It is not in the economic interest of the US to implement this regulation. According to the Department of Health and Human Services, refugees and their family members contributed more than \$343 billion in revenue to

federal, state and local coffers. On balance, refugees contributed \$63 billion more than they received in benefits from various programs. The U.S. economy benefits greatly from this population that works so hard when given a chance and permission to work. According to the Brookings Institute, refugees and asylum seekers engage in entrepreneurship at much higher rates than U.S. born individuals. In the U.S., for example, while immigrants are 15 percent of the population, they represent 25 percent of entrepreneurs. Small businesses and the jobs they create are the engines of growth, innovation, and economic stability of the United States.

Given the fact that asylum seekers are fleeing persecution in their home countries, the vast majority do not have sufficient resources to support themselves and their families for the duration of their immigration proceedings. The rule to eliminate the 30-day adjudication requirement would impose additional hardship on asylum seekers because they would face uncertainty and inconsistency in DHS processing. The proposed Rule would prevent asylum seekers from being able to support themselves and their loved ones through lawful employment.

AR003807

AR003808

# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k3-9d73-49ky
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2077

Comment Submitted by Patricia Fleck

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## Submitter Information

**Name:** Patricia Fleck

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## General Comment

President Trump has worked tirelessly behind the scenes to keep our country safe. Building the wall to keep out drug traffickers, human traffickers, and illegal aliens out of our country. Congress needs to focus on our country's safety and not focus on trying to get the country to hate a president who has the courage to stand up for what he believes.

AR003809



# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6s-6ydr
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2078

Comment Submitted by Natalie Petrucci

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## Submitter Information

**Name:** Natalie Petrucci

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## General Comment

I strongly oppose this proposed rule change. Ensuring that asylum seekers have a pathway to self sufficiency is of upmost importance. It is essential USCIS allow asylum applicants to receive work authorization after their cases have been pending for 180 days. While cases are delayed due to long backlogs and through no fault of the applicant, access to lawful employment is essential to ensure community integration and self sufficiency. Without this measure, many will be forced into dark economies where exploitation is rampant. Once an asylum seeker submits an I-589, they are not accruing unlawful presence. Thus, a legal pathway to work is appropriate, lawful, and humane.

AR003810

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-tirc
<b>Comments Due:</b> November 08, 2019
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2079

Comment Submitted by Alicia Kardell

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## Submitter Information

**Name:** Alicia Kardell

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## General Comment

Immigration is a total mess and we are at risk as a country with what has been in place for so many years and laws not being followed. High risk people are coming in and killing Americans and bringing drugs. Too many are clogging up our prison & health systems. it is taxing Americans & our economy. I support President Trumps reforms on that is happening at the border.

AR003811

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2080

Comment Submitted by KD Baker

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## Submitter Information

**Name:** KD Baker

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## General Comment

Asylum seekers would lose wages as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. Not working means lost salaries for asylum applicants that range from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation.

AR003812

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2081

Comment Submitted by Becky Bush

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## Submitter Information

**Name:** becky bush

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## General Comment

You need to fix our Immigration laws. Stand with President Trump and get this done. It's bad when illegal immigrates get better treatment than the legal immigrates and the American people!!! This can and needs to be done. Quit being partisan.

AR003813

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6v-58hn <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2082

Comment Submitted by Merrill Danford

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## Submitter Information

**Name:** Merrill Danford

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## General Comment

Throughout our history, Americans have been known for having big hearts.

This policy is shrivel-hearted, and a blatant attempt to deter asylum seekers from rights granted under international law, to which we are signatories.

None of these people are threats, and many are fleeing from problems we directly or indirectly caused.

AR003814

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2083

Comment Submitted by Charles Brown III

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## Submitter Information

**Name:** Charles Brown III

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## General Comment

Due to binding International obligations and clear Federal Law, people fleeing persecution on account of a protected ground have a right to seek asylum within the United States. It is crucial that humans seeking this protection be allowed to work while they are in the United States, especially in light of extensive delays with USCIS and EOIR in processing these claims. Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

Moreover, asylum seekers with valid work authorization pay taxes. USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

Finally, asylum seekers must already wait 180 days until they are eligible for work authorization after applying for asylum. Given current USCIS backlogs, the agency should not be instituting rules that add to their backlog rather than efficiently processing applications. The agency, not asylum seekers, should bear the burden of their incompetence.

AR003815

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2084

Comment Submitted by Brenda Osborne

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## Submitter Information

**Name:** Brenda Osborne

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## General Comment

Please support President Trump's Immigration Reforms. This will make our country safer if we KNOW WHO IS COMING INTO OUR COUNTRY!!

AR003816

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2085

Comment Submitted by Daniel Bloch

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## Submitter Information

**Name:** Daniel Bloch

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## General Comment

The proposed removal of the 30-day processing provision would only further harm asylum seekers who are already caught in overwhelmingly vulnerable and sometimes dire straits. They are victims of multiple systems that have broken down - from systems of justice, accountability, safety and protection that have broken down in their home countries to such an extent that they have seen no other option for their own well-being and that of their families to take flight, to the horrifyingly exclusionary policy machinations of the current US administration that do nothing to "solve" the border crisis and instead serve to reinforce and deepen it. The ability to work with officially sanctioned permission is a true lifeline for asylum seekers - especially since the vast majority of asylum seekers are not eligible for government support benefits before and during the initial stages of their process of applying for asylum. The proposed removal would further dis-empower asylum seekers, many of whom are family groups, and would likely force many to turn to the underground, informal economy thus putting them at even more risk for exploitation and danger, as well as having overall negative impacts on local economies. Keeping the 30-day processing provision in place would help salvage whatever tiny shred of credibility and decency this country still has when it comes to offering a modicum of protection to people who are seeking asylum.

AR003817



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2086

Comment Submitted by John Moran

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## Submitter Information

**Name:** John Moran

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## General Comment

President Trumps reform plan is the plan I and my family support.

AR003818

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2087

Comment Submitted by Kiersten McMahon

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## Submitter Information

**Name:** Kiersten McMahon

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## General Comment

As a paralegal who works with immigrants every day, I strongly oppose the proposed rule for removing the 30-day processing provision for asylum EAD's. Not only would the government lose \$39.15 million to \$118.54 million per year in taxes (by USCIS' own estimation), but asylum seekers, more than capable of working and providing for themselves, would be thrust into extreme poverty in our nation - stripping individuals of any chance at stability in our our nation. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Individuals will be unable to secure a valid ID (needed for many social services) and will be increasingly vulnerable to exploitation, trafficking, and underground economic risks - greatly increasing the chance that the asylum seekers will become public charges. Sadly, this proposed rule is just one facet of the current administration's campaign against humanity and I will not stand for it.

AR003819

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-7dzo
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2088

Comment Submitted by Malcolm Young

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## Submitter Information

**Name:** Malcolm Young

**Address:**

3680 38th Street NW

Apt B-242

Washington, DC, 20016-2910

**Email:** youngmalcolmc@gmail.com

**Phone:** 7737268123

**Organization:** Attorney at Law/ Consultant

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## General Comment

My name is Malcolm C. Young. I am an attorney, practicing until recently in Illinois and the District of Columbia, now retired from the bar in Illinois. I have known many immigrants and immigrant families in my communities. Recently, however, I worked with asylum seekers on a pro bono basis under the guidance of a non-profit staffed by immigration specialists. From that experience I gained knowledge of the process asylum seekers must undergo and the challenges that confront them and their families.

Coincidentally I am also a veteran and concerned about national security.

I oppose proposed changes in regulations which would further delay the 180 day period during which asylum seekers residing in the U. S. must now, under rulings in the Rosario case, wait before the United States Custom and Immigration Service must act on applications for employment authorization documents (EADs). The proposed changes will cost the United States, state and local governments tax and social security revenue. They will keep able workers out of a labor force that needs workers to meet the demands of an expanding economy. The proposed changes will decrease national security. The proposed changes will needlessly cause hardship on asylum seekers and their families.

More fully stated, my reasons for objecting to the proposed change include the fact that extending the period during which asylum seekers living in the United States cannot work reduces their contributions, along with their employers, to taxes, social security and Medicare. In the course of litigation, the United States Customs and

AR003820

Immigration Service (USCIS) has reportedly conceded that approximately \$40M to \$119M in tax revenue would be lost annually.

In addition, asylum seekers can get work because of the high demand for labor in many areas. So, they are adding to the capability of the labor market to sustain expansion in the economy. There's no evidence that they are displacing American citizens from jobs, increasing the rate of unemployment or suppressing wages for citizens. In the areas with which I am personally familiar, immigrants are doing skilled and semi-skilled work; it's clear that they are willing and able to work, contributing not drawing down on government resources. So there's no gain at all in delaying the period of time in which they can legally work and pay into our tax and social service systems.

I have heard the claim that delay is needed to more fully vet applicants for EADS for reasons of national security. This makes no sense at all. I am not aware that the government has shown that the applicant pool includes people who pose any greater risk to security than the general population. But if there is evidence that individuals in this group pose a security risk, then extending the period of time before applicants can apply for employment authorization documents, and therefore the period of time before they are vetted, increases the risk to the United States. A logical response to any concern about security would be to reduce the 150 day period as well as the 30 day period during which applicants cannot apply for documents. For example, reducing the 150 day period by 60 days while increasing the 30 day period by 30 days would give the agencies involved 60 days to conduct the vetting it is claimed is made necessary by national security concerns while reducing by 30 days the overall time that asylum seekers must wait before applying for documents. If the government has any real security concerns about this population, it should decrease the period of time in which USCIS must act on EADS by even more time.

Finally, I understand that USCIS has been able to process nearly all applications for EADS within the 30 day period, correcting a deficiency that began before this administration took office. There seems to be no compelling need, therefore, to extend the 30 period, never mind to completely remove time limits which would open the door to abuse of the system by government agencies.

AR003821

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2089

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am supportive of this rule. As a resident in an area with a very high immigrant population (legal or otherwise), I see how the system can be easily abused. Many businesses have an all immigrant workforce that undeniably displaces our young students, our disabled and our older Americans who are also seeking employment.

Extending work authorization lends itself to fraudulent claims of asylum as people are lured from other countries to earn a better hourly wage than is available in their own country. Friends, neighbors, family members encourage others to make the journey with the promise of legal employment often at the same employer where they currently work. Whole this nepotism is common and even encouraged in their country and culture, here it goes against the very fabric of our society and EEOC guidelines. We cannot expect a level playing field when the players are recruiting from outside the citizenry.

Far from being kind or practical, the policy unnecessarily puts innocent individuals at risk of great harm. By luring the citizens of other countries with the promise of fast employment at far greater wages, these individuals make a calculated judgement. They often gamble on the chance for higher wages by risking harm on the journey, spending money they dont have and abandoning family members including spouses, children and elders with the expectation that they can bring everyone back together in the future when they have legal status.

This great gamble puts everything at risk, and leaves them in a far worse financial predicament. The cost of the trip and paying human smugglers leaves them in debt, they have become modern day indentured servants. This is no better than forced slavery. Surely we as a country cannot be a party to this evil.

It is better that we provide witness to the conditions in the country of origin. The Guatemalan and Honduran gangs can simply be not so prevalent if the majority of the youth have already departed the country to reside in the USA. It defies logic that we would encourage the citizens of the countries to abandon their homes, lives and countries to come to America when the USA clearly has far deadlier gang violence and gun violence. Surely we should not be providing incentives for them to leap from the frying pan into the fire.

AR003822

Another aspect is that if the working age citizens of other countries leave, we are necessarily depriving these other countries of their greatest national resource: their own working-age population. A country is only as great as their citizenry, if they depart in huge migratory waves, what is left behind? In order to grow and prosper, we cannot in good conscience encourage the departure of the very people needed to make their country successful. If every doctor and engineer departs, who will be there to heal the sick and build the infrastructure? If every farmer departs, who will feed the citizens? It is cruel beyond measure to entice the population to depart their country of origin for the promise of a few hundred dollars in a weekly paycheck.

Emerging science has pointed to the health consequences of how sunlight reacts with our skin, and how vitamin D is processed differently in the southern hemisphere than the northern hemisphere. The difference in angles of how the sunlight penetrates the skin causes vitamin D synthesis to be optimal in heavily pigmented skin in the Southern Hemisphere. Northern Hemisphere vitamin D synthesis is optimal in lighter pigmented skin. The very health and well being of people is impacted when you relocate populations based on their latitude, it is a matter of science, and it is very risky to encourage large migrations of people without regard to the health consequences.

I hope you consider my thoughts and I hope you make the correct choice based on what will be best for the citizens of the USA as well as the citizens of the countries of origin. I hesitated to write this because of consequences of saying the wrong things, but hope that my input will somehow be helpful without causing problems in my own quiet life.

AR003823

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2090

Comment Submitted by Karen McCarthy

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## Submitter Information

**Name:** Karen McCarthy

**Address:**

Leadville, 80461

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## General Comment

Our community in Colorado wholeheartedly supports immigrants and asylum seekers! We believe that families fleeing persecution should have the right to work while their asylum applications are pending. Never forget that we are a strong nation of immigrants. We will vote for leaders and policy makers who support immigrants as well.

AR003824

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2091

Comment Submitted by Eric Dean

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## Submitter Information

**Name:** Eric Dean

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## General Comment

No timeline for illegals that cross into America. They stay in detention till they are deported or vetted and allowed in.

AR003825



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2092

Comment Submitted by Marlene Perrotte

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## Submitter Information

**Name:** Marlene Perrotte

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## General Comment

Asylum Seekers need to have their EAD processed within 30 days. they need to be able to work in order to survive in a new country. I have worked with Asylum seekers and have experienced their anguish waiting for their EAD.

AR003826

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2093

Comment Submitted by Benjamin Snyder

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## Submitter Information

**Name:** Benjamin Snyder

**Address:**

8500 Pennegrove Cir.

Charlotte, NC, 28214

**Email:** benasnyder@gmail.com

**Phone:** 3363927131

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## General Comment

Not allowing asylum seekers to obtain work authorization in a reasonable timeframe is a terrible policy. It smacks of overt, shameless anti-immigrant nativism. Asylum seekers throughout the past four decades, from Cuban asylees escaping Castro to Syrian asylees escaping ISIS, have relied on the opportunity to secure work authorization in order work and fund their long, difficult legal processes themselves. Especially at a time when historically low unemployment rates have created severe labor shortages in many places across various industries, allowing USCIS to neglect their duties to process lawful asylum seekers employment authorization documents is clearly nothing more than base demagoguery. This is a truly shameful, malicious proposal.

AR003827

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2094

Comment Submitted by Leland Bedell

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## Submitter Information

**Name:** Leland Bedell

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## General Comment

Please dont let this rule take affect. I am a small business owner and I need workers. I am having a hard time finding help. We need hard workers now.

It makes no sense to delay work opportunities for people who want to work. We need the workers in my business, we need the tax revenue they will generate to offset huge federal deficits, and we need people paying into social security.

Why pay welfare benefits for these folks when they want to work?

This just seems arbitrary and punitive. It helps no one and hurts many.

AR003828

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-9su2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2095

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am an immigrant and legal assistant working in immigration. I have experienced and seen first hand the many hardships that hundreds of immigrants must deal with in this country. They come here to escape poverty, violence, etc. They seek a better way of life for themselves and their families. They are willing to work, so why not give them the opportunity to do so? It would be beneficial for the asylum seekers and the country; there are plenty of positions available and filling them up would only help boost the country's economy. I see no reason to not let asylum seekers -who are already at a disadvantaged position in this country and who already sacrificed so much by migrating here- to be able to work and earn an income. They are seeking a legal way to gain employment, which is what so many people already demand of them. It would be even more cruel to put forth more limitations in their path towards seeking asylum in the great ol' United States of America: the land of the FREE and the home of the BRAVE.

AR003829

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

## Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

## Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

### Comment Submitted by A Patriotic Moderate Anonymous

## Name: A PATRIOTIC MODERATE Anonymous

Removing the 30-day processing provision for asylum applicants who seek work permits would be disastrous for our economy. USCIS has admitted that ALL LEVELS OF GOVERNMENT WILL LOSE TAX REVENUE AS A RESULT OF THE PROPOSED RULE CHANGE-- a loss of around \$39.15 MILLION TO \$118.54 MILLION PER YEAR since asylum seekers without work permits and their employers would not contribute those projected amounts to Medicare and to social security. MAKE AMERICA GREAT: DO NOT REMOVE THE 30-DAY PROCESSING PROVISION; MAKE ASYLUM-SEEKERS WORK AND PAY TAXES LIKE THE REST OF US DO!

file:///C:/...p/AR%20Assignments/Asylum%2030-Day%20Download%20(uploaded)/Public%20Comments/files/USCIS-2018-0001-2096.html[9/15/2020 4:11:14 PM]

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2097

Comment Submitted by Rebecca Voytek

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## Submitter Information

**Name:** Rebecca Voytek

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## General Comment

I am urging you to help President Trump secure Americas safety by removing the arbitrary bureaucratic timeline for background checks for asylum seekers that is hurting and not helping our broken immigration system

AR003831

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6t-8qqc <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2098

Comment Submitted by Phillip Kelley

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## Submitter Information

**Name:** Phillip Kelley

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## General Comment

We Must Do A Complete Check On Each Non-U.S.A. Person!!!

Lets Get Our Borders Tighten, Secured Period.

AR003832

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-ox6h
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2099

Comment Submitted by Ray Pryce

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## Submitter Information

**Name:** Ray Pryce

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## General Comment

Support the president's immigration reform's.

AR003833



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6r-ajp6 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2100

Comment Submitted by Susan Buckley

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## Submitter Information

**Name:** Susan Buckley

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## General Comment

Please give immigration officials adequate time to screen applicants for asylum or work permits to be in the United States

AR003834

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6z-ant9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2101

Comment Submitted by James Wiese

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## Submitter Information

**Name:** James Wiese

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## General Comment

Allow enough time for Immigrants to be fully checked out and approved. We need to keep criminals and unemployable and free-loaders who will be a burden or danger to America.

AR003835

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d71-p5tf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2102

Comment Submitted by Attorney At Law Anonymous

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## Submitter Information

**Name:** Attorney At Law Anonymous

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## General Comment

This administration alleges that immigrants should be "self-supporting" and "follow the laws". Creating a further delay in allowing asylum seekers to obtain a quick employment authorization document (EAD) creates a hurdle for those who are attempting to do it "the right way" to comply with the law by working with a valid EAD, obtain a driver's license to comply with traffic laws (EAD is required in many states for that), obtain housing, open bank accounts, etc. The government needs to be transparent. If this administration is going to complain about immigrants not doing it "the right way", it should not create new hurdles to impede immigrants from achieving that objective. Otherwise, the government is creating the problem it supposedly seeks to avoid, which will put in question the real motives for the changes. It goes without saying that ignorant/uneducated/racist and anti-immigrant comments should be completely ignored since they have no merit. Also, the mere fact that racists and anti-immigrants are openly supporting this should question the soundness of this proposed change.

AR003836

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-nvqf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2103

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

THIS ADMINISTRATION IS THE SWAMP!! DRAIN THIS SWAMP!! MOST CORRUPT  
ADMINISTRATION EVER!!

AR003837

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-jrdg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2104

Comment Submitted by Cameron M

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## Submitter Information

**Name:** Cameron M

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## General Comment

Please do not remove the 30 day requirement. This would delay the period of time before asylum seekers could begin working. Unemployment is at an incredible low, and our labor market is tight - we do not want to further shrink the labor pool! Additionally, no work means no taxes. Lets make sure that those who are able to work and contribute to America can do so.

Finally, and most importantly - its the morally right thing to do. Asylum seekers have left behind horrific circumstances. Lets give them the basic decency of a prompt, fair decision.

AR003838

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-pg63
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2105

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am an immigration paralegal. I know firsthand the experiences people go through to come to this country. They come in fear for their lives, ready to work hard to make this place beautiful. People have to work to live. This regulation is meant to scare people away who know they can't afford to wait endlessly without income - and without a status that allows them access to shelter and healthcare. All this does is increase the potential for human traffickers. It doesn't even make financial sense - this forces people out of legal jobs and thus cheats communities out of tax revenue. The Trump administration needs to stop wasting everyone's time with these ridiculous proposals.

AR003839

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6v-rb9r
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2106

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing as a landowner who, from time to time, has had occasion to hire day laborers to do manual labor on my properties. On occasion, these people have been asylum seekers. I have found them to be hard-working, honest, and eager to do whatever is asked of them to earn money for themselves and their families. To change this rule would put their earning capacity in jeopardy, which would not only adversely affect their ability to care for themselves and their families, but be a loss of what could amount to a considerable sum in tax revenue in total from this group of workers. If they are coming here to make a better life for themselves and their families, as so many Americans did when they came in previous times, I say let them come and prove themselves to be an asset to this great country of ours. And do this without this odious proposed rule.

AR003840

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-xiu8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2107

Comment Submitted by Leon Desourdy

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## Submitter Information

**Name:** Leon Desourdy

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## General Comment

SUPPORT PRESIDENT TRUMPS IMMIGRANTION REFORM AND END ARBITRARY TIMELINES FOR IMMIGRANTION!!!!!!!!!!!!!!

AR003841



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-kmx3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2108

Comment Submitted by Rose Naukam

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## Submitter Information

**Name:** Rose Naukam

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## General Comment

Please get rid of the time limits to properly verify backgrounds on asylum seekers. It is a ridiculous and dangerous, illogical rule, which is a great detriment to the health and safety of our citizens! Stop it now!

AR003842

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d71-s3ia
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2109

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the proposed measure as it will decrease tax revenues.

AR003843

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-xqwk
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2110

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I work in a legal services non-profit that works with immigrants, especially asylum seekers. This 30-day processing provision should NOT be removed. Doing so would put asylum seekers and their families at risk of housing and food insecurity. By not being able to participate in the regulated job market, asylum seekers would be forced to turn to under-the-table employment in order to provide for themselves and their families. This would put them at risk of labor exploitation, trafficking, and violence at the hands of unscrupulous, predatory employers. With no work permit, asylum seekers in many states, including mine, would be unable to obtain a valid ID, therefore hindering their access to transportation and other services. Being unable to work and relying on friends, family, or charity to survive can lead to serious depression and mental health issues.

Additionally, not allow asylum seekers to receive work authorization deprives the U.S. government of the taxes that would come from the lawful employment of asylum seekers. If asylum seekers don't have U.S. IDs and can't access lawful employment, they are less likely to turn to U.S. law enforcement if they are victims of crime or witnesses to crime, posing a public safety concern. Finally, seeking asylum is a legal right that foreign nationals have, and this attempt to bar people from employment is a naked attempt to prohibit people from exercising that right.

AR003844

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-n93a
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2111

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The United States should continue to be a welcoming place for all immigrants, but particularly for those fleeing violence and persecution in their home countries. Without employment authorization, asylum seekers cannot work and cannot seek to better their lives--not to mention contribute to the economy of the United States--while awaiting a decision in their cases. Please take a moment to put yourself in the shoes of those who come to the United States seeking a safe haven. Try to imagine what life is like for them and empathize with the challenges they face.

I urge USCIS to withdraw this rule, which will lead to greater hardships for a vulnerable population in need of protection. The money spent to implement this new rule would be better spent hiring more personnel to process work authorization applicants for all immigrants more quickly.

AR003845

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-rxqe
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2112

Comment Submitted by Sandra Greene

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## Submitter Information

**Name:** Sandra Greene

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## General Comment

Controlling our borders is very important. Without our borders we do not have a country. Support President Trump and immigration policy by supporting those he chooses to head up the various immigration services Departments including the DHS.

AR003846

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d71-f4n0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2113

Comment Submitted by Sarai Johnson

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## Submitter Information

**Name:** SARAI JOHNSON

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## General Comment

This proposed rule against Asylum applicants its harmful to our country because we are going against what this nation is all about. Our founders believed that this was a place for justice and liberty for all. And preventing Asylum applicants from not being able to work and provide for themselves and their families is not fair and just to them or us. Let them help themselves.

AR003847

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d74-trh6
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2114

Comment Submitted by Anthony Baquero

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## Submitter Information

**Name:** Anthony Baquero

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## General Comment

Removing this requirement would cause significant harm to asylum applicants. It is almost certain that not holding USCIS to this standard would result in an abuse of power. It would result in applicants not being allowed to seek work and seek a drivers license because they will not have the necessary documents. These people would then live in the shadows. They would then not receive necessary health benefits and lose access to community benefits. Without working there would be limited access to food and a significant risk of homelessness.

AR003848

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2115

Comment Submitted by Efrain Alsina

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## Submitter Information

**Name:** Efrain Alsina

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## General Comment

I have been an immigration practitioner for 20 years. The proposed change to the 30-day adjudication period for initial EAD for asylum seeker should not be eliminated. Eliminating this period will make asylum seekers have to wait longer to obtain employment authorization at a time when it takes longer for DHS to adjudicate asylum applications. There is no affirmative asylum bulletin being published now, but from my office's experience, after a substantial reduction in time for the adjudication of affirmative asylum application in 2018, they are once again back to over 180 days. Delaying asylum seeker's ability to obtain employment authorization is also a delay in their ability to obtain medical insurance, driver license, social security numbers. This in turn put them at a greater risk of having to drive without a license, work for unscrupulous employers who will pay under the table and disregard employment safety regulations. It also means that these employees will not contribute to the SSA, employment-related taxes, federal or state income taxes.

If you want to get rid of the 30-day adjudication period for initial EAD, consider instead doing away with the 150-day wait to file for initial EAD altogether or charging a fee for the initial EAD. If the problem is the expense related to processing the EAD within 30-days, then charging a fee for the initial EAD will help overcome this.

Also keep in mind that as application fees have consistently gone up, so it has the delay in processing them.

AR003849



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6s-2whg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2116

Comment Submitted by Sharon Phillips

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## Submitter Information

**Name:** Sharon Phillips

**Address:**

825 West End Ave.

Suite 1E

New York, NY, 10025

**Email:** sharon@sjplegal.com

**Phone:** 2122804005

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## General Comment

It makes no sense to eliminate the 30-day deadline for USCIS to process EAD's for eligible asylum seekers. We know from the elimination of the regulatory 90-day limit for processing non-asylum based EADs that without a time limit, the waiting periods will be extremely long.

Asylum seekers are already required by law to wait 150 days after filing their asylum claim before they may apply for employment authorization. As it is, this waiting period is laughably unrealistic: it is a deeply flawed compromise between the government's policy goal of deterring fraudulent claims (and/or punishing family members who take in asylum seekers) and the reality that human beings need to eat.

Employment authorization is an interim benefit that is intended to allow people who have filed non-frivolous claims to be self-reliant and to work within the regular labor force while awaiting resolution of their claims. Enabling people to work within the regular labor market, rather than off the books, protects them and protects the wages and working conditions of American workers working in the same sectors. Forcing people to work off the books exposes them to exploitation and benefits nobody.

Once asylum applicants have waited the 150 days, they should be issued employment authorization promptly.

AR003850

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6z-q780
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2117

Comment Submitted by Diana Velardo

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## Submitter Information

**Name:** diana velardo

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## General Comment

The US government is and has been a pillar of hope and a bright shining light for those in desperate need. Our moral compass and subsequent laws and regulations ought to make it easier for people seeking refuge to legally and quickly become self sufficient. Making sure that A group like asylum seekers can quickly gain a work permit is beneficial to society overall. It ensures that the newcomers can start contributing to society and their own life. Why would we want to pass up of another great source of taxable income? Helping people doing things the legal way is the most important thing. There are plenty of jobs that need to be filled and local communities can reap the rewards while traumatized people are given a chance to work for the American dream. Its a win win situation!

AR003851

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d70-t9c8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2118

Comment Submitted by Rebecca Nelson, America Solidaria

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## Submitter Information

**Name:** Rebecca Nelson

**Address:**

1444 Belmont Street NW  
Washington, 20009

**Email:** rebecca@americasolidaria.org

**Phone:** 3153231274

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## General Comment

My name is Rebecca Nelson and I'm a resident of Washington, DC. I work for a nonprofit organization called America Solidaria with a presence throughout Latin America so I'm familiar with the situations that drive many people to seek asylum in the United States.

The 30-day processing provision not only helps asylum seekers by opening the way for them to have a source of income, it also helps them join the U.S. labor force in a timely fashion... which helps all American citizens and the U.S. economy. If we are concerned about asylum seekers becoming a burden, why not let them work? We know that long delays are ubiquitous throughout our immigration and asylum system so removing this deadline to process their work permit would likely result in ruinous delays.

Imagine what it would be like to flee persecution in your own country and arrive in the U.S. ready to start a new life as a productive member of society, only to be denied the ability to work and provide for yourself and your family. Without the ability to earn an income, they would be unable to afford rent, food, medicine, or a lawyer to process their asylum cases. This limitation would also prevent people from securing a valid ID, making them much more marginalized in U.S. society and vulnerable to trafficking and the underground economy.

Let's look at the numbers: according to USCIS, the lost income for asylum applicants could be anywhere from \$255.88 million to \$774.76 million in taxable income annually. This means lost contribution to the U.S. economy and a loss of taxes as well. We could lose as much as \$39.15 million to \$118.54 million per year because, by not allowing asylum seekers to work, they and their employers are not contributing to Medicare and social security.

AR003852

AR003853

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6s-vvx0
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2119

Comment Submitted by Farhad Sethna

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## Submitter Information

**Name:** Farhad Sethna

**Address:**

141 broad boulevard suite 101

Cuyahoga Falls,

**Email:** Fsethna@immigration-America.com

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## General Comment

I am a practicing immigration attorney. As such, we file dozens of employment authorization applications each year, both for initial approval as well as for renewals, or extensions.

It would be a tremendous burden both to our government as well as to the alien, to do away with the 30 day EAD issuance rule. Employers need aliens to work. When aliens work, they contribute to their US employers as well as to our taxpayers. They are able to support themselves, rather than resorting to public assistance for their United States Children.

It is a foolish move by a immigrant-bashing administration to remove the 30 day processing time. Employment authorization applications are by their very nature simple applications to adjudicate. There is no need for the 30 day rule to be scrapped. By its own admission, the USCIS has calculated that the loss to the federal government as well as the loss of tax revenue will run into the hundreds of millions of dollars. This is scarcely money that our country can afford to lose.

Aliens who are granted work authorization also become eligible to obtain state IDs or state drivers licenses and Social Security numbers, thereby making them less susceptible to exploitation, and less likely to commit crimes or skirt the law or work illegally. Therefore, providing employment authorization documents within 30 days remains a laudable and achievable goal. to its credit, the USCIS has achieved that goal since last year. This mile stone achievement by USCIS should not be overturned. Politics should not have a place in providing employment authorizations to those who can benefit our economy through their hard work.

AR003854

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-htg5
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2120

Comment Submitted by Alicia Evans

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## Submitter Information

**Name:** Alicia Evans

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## General Comment

Please get off President Trumps back He has done a good job but no one has given him credit. I pray for hum daily and hope others do too. I think it is a shame that this president has had to go through so many issues. bet no other person has had to do that in our great USA. God bless him and his wife. He doesn't even take a salary. No other president has done that and when they get out of office they are worth more than when they went in....

AR003855

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6y-jo9o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2121

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Do not remove the 30 day processing rule for asylum EADs. By doing so, you are encouraging unauthorized employment by employers and employees. People cannot live in a country where they are unable to work. If you want asylum seekers to pull themselves up by their bootstraps, you need to give them some bootstraps.

AR003856

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-jmp9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2122

Comment Submitted by Jennifer Nissen

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## Submitter Information

**Name:** Jennifer Nissen

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## General Comment

I oppose this proposed rule. Asylum seekers would lose wages and benefits as a result of a delay in their ability to work, which would affect their ability to support themselves and their families. The loss of income to asylum-seekers will cause harm to this already-vulnerable community. Additionally, individuals will be unable to secure a valid ID and be increasingly vulnerable to exploitation, trafficking, and other risks. The lack of ability to work and correlating lack of income also increases the risk that people coming to the United States will become a public charge.

USCIS admits that all levels of government will lose tax revenue of more than \$39 million per year as a result of the proposed rule change, because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

AR003857



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-jc7e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2123

Comment Submitted by Denise Curry, Torture Abolition and Survivors Support Abolition

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## Submitter Information

**Name:** Denise Curry

**Address:**

1238 Evarts St. NE

Washington, 20018

**Email:** denise.curry@sndden.org

**Phone:** 2025384221

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## General Comment

I have experience working with asylum seekers. For eleven years I volunteered at TASSC (Torture Abolition and Survivors Support Abolition) in Washington DC.

What were they supposed to do while awaiting work authorization?

The asylum seekers were educated people with well developed skills and experience. Clearly they had a lot to offer our country. Why punish them?

AR003858

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-r6ve
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2124

Comment Submitted by Jennifer Whitlock

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## Submitter Information

**Name:** Jennifer Whitlock

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## General Comment

If a significant number of EADs take longer to adjudicate, more asylum-seekers will need to rely on the mercy of others creating a population of folks who will suffer needlessly when they are able and willing to work.

AR003859

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d70-dytv
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2125

Comment Submitted by HeeJung Wescoat

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## Submitter Information

**Name:** HeeJung Wescoat

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## General Comment

Please allow asylum workers to work earlier rather than later because its the right thing to do.

1. helps the family - thats why they are here - because they wanted to DO something rather than be helpless in their own countries in the face of unspeakable injustice.
2. helps the US
  - a. government doesnt have to support them
  - b. data point for asylum
  - c. improves the process

These are PEOPLE like us who want to live the American dream and they want to do so legally. PLEASE make changes that improve the process. Please do not create situations that force otherwise law-abiding citizens to do desperate things.

Lets work together for the betterment of the US and the world.

Respectfully yours,

AR003860

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6w-nx6q
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2126

Comment Submitted by Virginia Alexander

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## Submitter Information

**Name:** Virginia Alexander

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## General Comment

When are you going to support the position of U.S. President? We honored the position when Obama was there! Why do you want a civil war?? Because thats what its coming to! President Trump is soups great job! But even if he wasnt, we still honored the position! The democrats need to grow up & do their job of protecting America & its people!

AR003861

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d73-gjog <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2127

Comment Submitted by Lauris Wren

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## Submitter Information

**Name:** Lauris Wren

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## General Comment

Do NOT remove 30 day processing of work permits. How are refugees, who fled with nothing, supposed to live if they cannot work? They will have to work illegally, which opens them up to abuse and exploitation. That's just wrong. If the courts or asylum offices are so backlogged that their cases take a long time, you have to give work permits.

AR003862

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d72-p5ll <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2128

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

**Address:**

1742 West Indianola Avenue

Phoenix, 85015

**Email:** ellaherrington@outlook.com

**Phone:** 6023741855

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## General Comment

Removing the 30 day processing provision for Employment Authorization is a bad idea. First, without the provision, there is little incentive to move the applications forward. More importantly, asylum seekers are legally in the country while they are going through there case. It is crucial for the individuals and their families to have a means to support themselves. Food, shelter and clothing are expensive and real needs, without employment there is great risk of hunger, homelessness and desperation. Work not only gives the asylum seekers the means to provide these things, it also helps to stave off depression and isolation. It is a means to a fuller intergration into the community and typically a chance for English learning skills. In addition, it is good for the city, state and country to have a active workforce.

AR003863

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-o0uf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2129

Comment Submitted by Roland LaChance

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## Submitter Information

**Name:** Roland LaChance

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## General Comment

The best person to be President is President Trump, PERIOD.

AR003864

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-51a7
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2130

Comment Submitted by Josefina Saldaa

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## Submitter Information

**Name:** Josefina Saldaa

**Address:**

535 Dean St. #806

Brooklyn, NY, 11217

**Email:** finita.saldana@gmail.com

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## General Comment

Please don't remove the 30-day deadline for processing work permits! That is like cutting off your nose to spite your face. When these women work they are taxed, contributing to a social fund they may well not ever even benefit from if they receive negative decisions on their asylum case. As a Catholic who works regularly with women asylum seekers who have dependent children, I know first hand that these women want and need to work as they await decisions on their cases. These are honest women fleeing horrible circumstances and have arrived LEGALLY, seeking their international right to asylum. To remove the 30-day deadline would mean they would linger in states of abject dependency, and this would inevitably be much more expensive for the American taxpayer. Americans are always demanding that people work, instead of depend on the government. Well, let's not eliminate a key way that asylum seekers make a living and contribute to our economy!

AR003865



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-ffxh
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2131

Comment Submitted by Verity Caruso

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## Submitter Information

**Name:** Verity Caruso

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## General Comment

Diversity makes America better. This country was built by hardworking immigrants. I oppose the removal of the 30-day processing provision. We, as a first world nation, need to help care for our brothers and sister in harms way. Protect Asylum.

AR003866

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d74-fkpx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2132

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing about the proposed regulation change that would eliminate the 30-day processing time for EAD applications. Please do not remove this deadline, and certainly not without replacing it with a new deadline, such as 60 days or 90 days, if 30 is not feasible. An open-ended processing time would be disastrous for asylum seekers, our communities, and the credibility of our government. Asylum seekers are already waiting 150 days before they can even apply for an EAD, and if additional processing time is needed for applications, then applicants should be permitted to apply for an EAD sooner, so that their overall wait time does not increase. The ability to work and support themselves and their families, as well as to pay taxes, is essential to asylum seekers' ability to survive and integrate in this country.

Like so many of the policy and regulation changes directed at immigrants by this administration, this looks like a blatant attack on asylum seekers and immigrants in general, intended to thwart their ability to survive here. This is not the America I grew up in and I find it appalling.

AR003867

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6s-ip1w <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2133

Comment Submitted by Marc Reynolds

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## Submitter Information

**Name:** Marc Reynolds

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## General Comment

Stop bringing unwanted refugees into America! Follow our President's advice and leadership with regards to immigration.

AR003868

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6s-p9pm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2134

Comment Submitted by Bette Stockton

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## Submitter Information

**Name:** Bette Stockton

**Address:**

274 Chestnut St.  
San Francisco, CA, 94133

**Email:** bette\_stockton@hotmail.com

**Phone:** 415 956 7345

**Fax:** None

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## General Comment

This intent to remove the 30 day processing provision for asylum applicants who are eligible to apply for an employment authorization document is a severe deprivation of an important right for persons seeking protection in the U.S. These asylum seekers have legitimate claims for being allowed to remain in the United States. By depriving them of the right to work legally while the merits of their cases are adjudicated under due process negatively impacts every applicant. This deprives the applicant and members of the immediate family of the right to pursue a legally recognized application for relief. This is another example of reversing the protection the US has been known to provide to bona fide refugees and asylum applicants. I strongly object to this negative change in processing for an asylum applicant.

AR003869

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-brdj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2135

Comment Submitted by Ronald Huebner

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## Submitter Information

**Name:** Ronald Huebner

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## General Comment

Please help regain control over our borders and those we permit to immigrate to our country.

AR003870

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d70-kr1n
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2136

Comment Submitted by Shobila Kaligounder

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## Submitter Information

**Name:** Shobila Kaligounder

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## General Comment

If this authorization to work is revoked the individuals will further struggle. The people who apply for asylum have already find through situations that we can hardly imagine. It is inhuman to further deprive them an opportunity to survive. Hope the gov will reconsider its option.

AR003871

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d73-zyww <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2137

Comment Submitted by Donna McKenzie

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## Submitter Information

**Name:** Donna McKenzie

---

## General Comment

The United States needs an appropriate amount of time to thoroughly check/validate the background of every asylum seeker who requests access to live in America.

We cannot afford to cut corners in this process. It will only make America less safe. Americans deserve to have the government protect our borders. It is time to stop this foolishness by arbitrarily setting timelines that are unreasonable.

AR003872

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d71-u2xm
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2138

Comment Submitted by Joann Bautista, National Immigrant Justice Center

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## Submitter Information

**Name:** Joann Bautista

**Submitter's Representative:** Joann Bautista

**Organization:** National Immigrant Justice Center

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## General Comment

See attached file(s)

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## Attachments

NIJC comment - Removal of 30-day processing provision EAD

AR003873



November 08, 2019

*Submitted via [www.regulations.gov](http://www.regulations.gov)*

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, D.C. 20529-2140

Re: DHS Docket No. USCIS-2018-0001, RIN 1615-AC19 Comment in Response to Proposed Rulemaking: Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications

Dear Sir/Madam:

I am writing on behalf of the National Immigrant Justice Center (NIJC) in response to the Department of Homeland Security's (DHS) proposed rule to express our strong opposition to the changes regarding the process time for work permits for asylum applicants published in the Federal Register on September 9, 2019 (RIN 1615-AC19; DHS Docket No. USCIS-2018-0001).<sup>1</sup>

NIJC is dedicated to ensuring human rights protections and access to justice for immigrants, refugees, and asylum seekers. NIJC provides direct legal services to and advocates for these populations through policy reform, impact litigation, and public education. Since its founding more than three decades ago, NIJC has been unique in blending individual client advocacy with broad-based systemic change. Headquartered in Chicago, with additional offices elsewhere in the Midwest, San Diego, and Washington, D.C., NIJC provides legal services to more than 10,000 individuals each year, including individuals from across the globe who have come to the United States seeking safety and refuge. In 2018, NIJC provided legal services to more than 1,300 asylum seekers.

The United States' legal and moral obligations to protect those seeking safety from persecution

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<sup>1</sup> Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, 84 Fed. Reg. 47,148 (Sep. 09, 2019) (to be codified at 8 C.F.R. pt. 208).

includes the obligation to ensure that those seeking and those granted asylum are able to access the benefits and services that enable them to live a full life. Chipping away at the ability of asylum seekers to access employment authorization directly contravenes these obligations.

This comment will address: 1) the disproportionate harm the rule will have on already vulnerable and disadvantaged populations; 2) the ways in which the rule will negatively affect the local, state, and national economy; and 3) the reality that this rule is simply another method being used by this administration to undercut protections for asylum seekers. We urge the rule to be withdrawn in its entirety, as it will only exacerbate financial challenges asylum applicants face and negatively impact the economy. In short, this rule is nothing more than another component part of the administration's efforts to destabilize the asylum system and erect barriers to the achievement of health, safety and well-being for those seeking protection in the United States.

### **I. The proposed rule will disproportionately hurt already vulnerable disadvantaged populations.**

For asylum seekers, getting a work authorization document (EAD, or "work permit") is a crucial step toward finding safety and accessing the services and community support necessary to begin rebuilding a full and productive life.

Most asylum seekers cannot obtain any form of identification, such as a driver's license, without first receiving their EAD. Delaying the ability of asylum seekers to obtain an EAD, therefore, not only deprives asylum seekers of the ability to build financial security but also undermines access to numerous building blocks of stability, such as: accessing social benefits, opening a bank account, registering their child for school, or ensuring their home gets heating and electricity.<sup>2</sup>

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*NIJC client Lucy, the sole caretaker for her four grandchildren, was facing a hopeless situation. Before getting her work permit she and her grandchildren were living in cramped quarters with distant relatives, barely surviving. Lucy remembers one night as an illustration of just how dire their situation was, when the family of five had to share one egg for dinner. After Lucy received her work permit she was able to find a steady full-time job and move out of the cramped living situation she and her grandchildren were in. For her, an EAD was the first step toward achieving the ability to provide the basic things that she and her grandchildren needed to not only survive but thrive.*

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The right to work and the right to a sufficient standard of living are basic tenants of international human rights law; the Universal Declaration of Human Rights provides that these rights apply to "everyone, without any discrimination . . ."<sup>3</sup> Denying asylum seekers of the ability to quickly

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<sup>2</sup> For more, see THE CENTER FOR POPULAR DEMOCRACY (CPD), *Who We Are*, 7 (Dec. 2013), <https://populardemocracy.org/sites/default/files/municipal%20id%20report.pdf>.

<sup>3</sup> See Universal Declaration of Human Rights, G.A. 217A, U.N. GAOR, 3d Sess., 1st plen. Mtg., U.N. Doc. A/810 (Dec.

and meaningfully access the right to work undermines the very premise of a domestic system of refugee protection.

The proposed rule will leave thousands of asylum seekers without the ability to work lawfully.

Delaying asylum seekers' access to lawful employment during the pendency of their asylum claims will remove countless willing workers from the United States work force. The proposed rule acknowledges that "lost compensation to asylum applicants could range from \$255.88 million to \$774.76 million annually,"<sup>4</sup> Undoubtedly, this will cause significant financial hardship to asylum applicants who are unable to work and to those who depend on them financially. For asylum seekers, many of whom are already traumatized by the threats and persecution that led them to apply for asylum, closing off the ability to work will have a massive destabilizing effect leading to housing instability, food insecurity, and vulnerability to serious physical and mental health deterioration.<sup>5</sup>

Without a prompt work permit, asylum applicants will be unable to access many services that enable them and their families to survive and thrive.

Accessing employment authorization is the key that allows asylum seekers and asylees to access services and public spaces that are critical to succeed and thrive in the United States. Delaying access to EADs for asylum seekers will have impacts far beyond wage loss. Without a functioning ID document, asylum seekers and their families might, for example, be unable to: rent a home or apartment, get a library card, apply for food stamps, get married, purchase a cell phone, or pick up a prescription.<sup>6</sup>

Forcing asylum seekers to wait for an unknown amount of time before they can even apply for a work permit leaves them and their families in precarious economic positions, raising the likelihood of needed reliance on local, state, or federal assistance such as food stamps and subsidized housing or even homeless shelters. For some immigrants and their families, however, accessing such support is either impossible or clouded by fear and vulnerability because of the administration's regulatory efforts to punish immigrants who rely on public benefits.<sup>7</sup> Although

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12, 1948).

<sup>4</sup> Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, 84 Fed. Reg. at 47,148.

<sup>5</sup> HUMAN RIGHTS FIRST, *New Work Authorization Rule for Asylum Seekers Could Have Devastating Consequences*, (Sept. 06, 2019), <https://www.humanrightsfirst.org/press-release/new-work-authorization-rule-asylum-seekers-could-have-devastating-consequences>.

<sup>6</sup> Ashe Schow, *24 Things that Require a Photo ID*, WASHINGTON EXAMINER (Aug. 14, 2013), <https://www.washingtonexaminer.com/24-things-that-require-a-photo-id>.

<sup>7</sup> Sarah Holder, *How Rule Changes about Public Benefits Could Affect Immigrants*, CITYLAB (Aug. 13, 2019),

numerous federal courts have issued preliminary injunctions indefinitely blocking that proposed rule from being implemented,<sup>8</sup> grave fears linger in immigrant communities as families remain scared and uncertain as to which benefits it is safe for them to access.<sup>9</sup>

Delaying asylum seekers' access to work authorization and the benefits that accompany it will only exacerbate the widespread chill in immigrant communities that has gravely impacted the ability of immigrant communities to access protections from local law enforcement or engage with state and local government writ large. Immigrants and their families live under a cloud of fear that any interaction with police will lead to a request to see their ID and questions about their immigration status.<sup>10</sup>

A 2018 study conducted by Urban Institute found that amongst immigrant families, one out of every six adults in immigrant families stated they were afraid to engage in everyday activities such as driving, applying for or renewing a driver's license, talking to police, or reporting a crime due to fear "in which they could be asked or bothered about [their] citizenship status."<sup>11</sup> In 2017, the police chiefs of Houston<sup>12</sup> and Los Angeles<sup>13</sup> reported a significant decrease in the number of sexual and domestic violence reports received by their offices. This decrease was attributed to the increased fear driven by

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*Without his work permit NIJC client Amadou would never have been able to follow his dreams of going to medical school and giving back to his community. Amadou received his work permit and upon graduating from high school, he found part-time work at a local post office. With the money he earns, he is using it to put himself through community college. Amadou has big plans for his life, which would all have to be put on hold or force him to rely on public benefits if had to wait indefinitely for his work permit.*

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<https://www.citylab.com/equity/2019/08/public-charge-rule-legal-immigration-welfare-services-dhs/595987/>.

<sup>8</sup> Olivia Golden, *Five Federal Courts Enjoin Public Charge Rule, Citing Powerful Evidence*, THE CENTER FOR LAW AND SOCIAL POLICY, <https://www.clasp.org/blog/five-federal-courts-enjoin-public-charge-rule-citing-powerful-evidence>.

<sup>9</sup> Elizabeth Trovall, *Immigrant Families Suffer Health Impacts, As Many Fear New Public Charge Rule*, HOUSTON PUBLIC MEDIA (Aug. 16, 2019), <https://www.houstonpublicmedia.org/articles/news/in-depth/2019/08/16/342934/immigrant-families-suffer-health-impacts-as-many-fear-new-public-charge-rule/>,

<sup>10</sup> *Who We Are*, *supra* note 2, at 8.

<sup>11</sup> Hamutal Bernstein et al., *Adults in Immigrant Families Report Avoiding Routine Activities Because of Immigration Concerns*, URBAN INSTITUTE, 2, 11 (July 2019), [https://www.urban.org/sites/default/files/publication/100626/2019.07.22\\_immigrants\\_avoiding\\_activities\\_final\\_v2\\_1.pdf](https://www.urban.org/sites/default/files/publication/100626/2019.07.22_immigrants_avoiding_activities_final_v2_1.pdf).

<sup>12</sup> Brooke A. Lewis, *HPD Chief Announces Decrease in Hispanics Reporting Rape and Violent Crimes Compared to Last Year*, HOUSTON CHRONICLE (Apr. 06, 2017), <https://www.chron.com/news/houston-texas/houston/article/HPD-chief-announces-decrease-in-Hispanics-11053829.php>.

<sup>13</sup> James Queally, *Latinos are Reporting Fewer Sexual Assaults Amid a Climate of Fear in Immigrant Communities, LAPD Says*, LOS ANGELES TIMES (Mar. 21, 2017), <https://www.latimes.com/local/lanow/la-me-ln-immigrant-crime-reporting-drops-20170321-story.html>.

aggressive immigration initiatives promised by the then-new administration.<sup>14</sup>

With a work permit, and thus an ID, asylum seekers do not have to hesitate to call the police if they or someone they know are victims of a crime. Allowing asylum seekers to promptly receive work permits, which opens the door to other forms of identification and security, will increase the safety not just of asylum seekers and their families but of all United States neighborhoods and communities.

Providing asylum seekers with employment authorization and the ensuing ability to access community services also fosters inclusion. Many undocumented immigrants are forced to live in the shadows of their communities and cities. Immigrants—documented and undocumented—avoid public spaces for fear of being asked to display an ID and face ensuing immigration enforcement.<sup>15</sup> This fear hinders’ immigrants’ ability to establish meaningful connections within their neighborhoods and communities and heightens physical and psychological distress,<sup>16</sup> which may manifest in the form of depressive or anxiety disorders, PTSD, or even neurocognitive disorder as a result of a traumatic brain injury due to abuse or injury.<sup>17</sup> Asylum seekers should be able to take their children to school or go to their local library without being afraid they may be

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*NIJC client Esmeralda suffered severe violence and abuse in her home country. After she received her work permit, she was able to find a job and gain access to therapy she so critically needed to process her past trauma. Thanks to her therapy, she is now able to manage the anxiety she experiences daily. Timely access to lawful employment was, for Esmeralda, critical not only to her mental health and well-being but also to her ability to meaningfully present her asylum claim to an adjudicator.*

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asked for ID or feel alienated from their community simply because they do not have an ID.<sup>18</sup> Empowering immigrant communities with work permits that are quickly processed will mean more productive and safer communities.

Denying access to work permits means compromising immigrants’ ability to meaningfully pursue their asylum claim.

Without an ability to lawfully work, asylum seekers cannot afford legal counsel and are thus significantly less likely to win relief. In fact, an asylum seeker is

approximately five times more likely to be successful in an asylum case if they have a

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<sup>14</sup> Proclamation No. 13767, 82 Fed. Reg. 8,793 (Jan. 25, 2017).

<sup>15</sup> Bernstein, *supra* note 11.

<sup>16</sup> Bernstein, *supra* note 11, at 11-12.

<sup>17</sup> Roy Aranda, *Living in the Shadows: Plight of the Undocumented*, J. CLINICAL PSYCHOL. (2016), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5129489/>.

<sup>18</sup> See THE CENTER FOR POPULAR DEMOCRACY, *Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program* (Nov. 2015), [https://populardemocracy.org/sites/default/files/Municipal-ID-Report\\_WEB\\_Nov2015\\_0.pdf](https://populardemocracy.org/sites/default/files/Municipal-ID-Report_WEB_Nov2015_0.pdf).

representation.<sup>19</sup> Because most asylum seekers often flee their home country with little to no warning, once they arrive to the United States these individuals often arrive with few personal belongings or nothing at all. It is then no surprise asylum seekers do not have the financial means to be able to hire a private attorney and then must rely on local non-profits to assist them. For asylum applicants who do find pro bono or low cost representation, attendant expenses such as paying for transportation to get to and from meetings with their attorney or even to court appearances are impossible to cover without work authorization.

## **II. The proposed rule will negatively affect the local, state, and national economy.**

### Many industries in the United States rely on immigrant employees.

Immigrants are a critical factor in keeping the United States' economy healthy and growing. Immigrants are more concentrated in labor markets that literally feed and house America—in 2016 “immigrants accounted for one in four construction workers”<sup>20</sup> and seven out of ten agricultural workers were born in Mexico with only one out of four born in the United States.<sup>21</sup> Additionally, with baby boomers aging, the U.S. will need more than 800,000 individuals to take jobs that not only replace them in the workforce but also would take care of this population.<sup>22</sup> The proposed rule will cut into these economic gains by effectively removing a large number of individuals from working.

Companies that would employ these asylum-seekers will either have insufficient access to labor or bear the costs of finding alternative labor. Finding other populations to take over labor intensive jobs, such as agriculture and farming jobs, will be next to impossible. Certainly, asylum seekers are more than capable of filling other roles in the workforce but this illustrates not only the shortages employers are facing but also brings up dangerous that may occur when immigrants are forced to work under the table. Immigrants who work in the shadows of the American economy become more vulnerable to exploitation – inhumane and abusive working conditions with swift retaliation if they attempt to stand up for themselves or report any of the abuses.<sup>23</sup>

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<sup>19</sup> Samantha Balaban, *Without a Lawyer, Asylum-Seekers Struggle with Confusing Legal Processes*, NPR (Feb. 25, 2018), <https://www.npr.org/2018/02/25/588646667/without-a-lawyer-asylum-seekers-struggle-with-confusing-legal-processes>.

<sup>20</sup> Eduardo Porter, *Short of Workers, U.S. Builders and Farmers Crave More Immigrants*, NY TIMES (Apr. 03, 2019), <https://www.nytimes.com/2019/04/03/business/economy/immigration-labor-economy.html>.

<sup>21</sup> *Id.*

<sup>22</sup> Mary Jo Dudley, *These U.S. Industries Can't Work Without Illegal Immigrants* (Jan. 10, 2019), <https://www.cbsnews.com/news/illegal-immigrants-us-jobs-economy-farm-workers-taxes/>.

<sup>23</sup> Paul Harris, *Undocumented Workers' Grim Reality: Speak Out on Abuse and Risk Deportation*, THE GUARDIAN (Mar. 23, 2013), <https://www.theguardian.com/world/2013/mar/28/undocumented-migrants-worker-abuse-deportation>.



Local, state, and federal governments will lose income tax revenue from asylum-seekers who are delayed in entering the job market or forced to work in the shadow economy.

In the proposed rule, DHS estimates that the *annual* Medicare and social security revenue loss to the government to be between \$39.15 to \$118.54 million dollars.<sup>24</sup> Moreover, DHS estimates the rule will cause asylum-seekers to *annually* lose \$255.88 to \$774.76 million in income.<sup>25</sup> This means that rather than having that amount of money being pumped back into their communities and states, allowing for improved streets, schools, and healthier citizens, those funds will be completely flushed down the drain.

### **III. The proposed rule is simply another way the administration is attempting to undercut protections for asylum seekers.**

*NIJC client Katie found independence and safety with her work permit. Katie fled her home country due to violent persecution she faced by a powerful gang. Upon arriving in the United States, Katie lived with her two children and their abusive father, who exerted immense control over Katie. Obtaining her EAD allowed Katie to move out of the house she previously shared with her abuser and gain financial independence. Moreover, Katie was able to get an ID not only for herself but her children, who did not previously have any ID because the consulate from her home country required her abuser's presence to apply for their passports.*

This administration's third-country transit bar, instituting of the so-called "Migrant Protection Protocols" (MPP) is clear evidence that this administration is attempting to make it harder for individuals who seek safe haven at the Mexico-U.S. border to win asylum and get on a path to citizenship.<sup>26</sup> To date, this cruel policy has impacted almost 50,000 asylum seekers and will likely impact more the longer it remains active.<sup>27</sup> This proposed rule change is another attack, in a long line of attacks, by this administration in an effort to deter and inflict as much harm as possible.<sup>28</sup>

DHS's proposed justification for pursuing this rule change should not be given credence. In the rule, DHS argues that increasing processing time is a way to reduce fraud and uphold national security.<sup>29</sup> However, as with much rhetoric

<sup>24</sup> Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, 84 Fed. Reg. at 47,150.

<sup>25</sup> *Id.*

<sup>26</sup> HUMAN RIGHTS FIRST, *Order from Above: Massive Human Rights Abuses Under Trump Administration Return to Mexico Policy* (Oct. 2019), <https://www.humanrightsfirst.org/sites/default/files/hrordersfromabove.pdf>.

<sup>27</sup> *Id.*

<sup>28</sup> Heidi Altman & Joann Bautista, *A Timeline of the Trump Administration's Efforts to End Asylum*, NATIONAL IMMIGRANT JUSTICE CENTER (Aug. 27, 2019), <https://www.immigrantjustice.org/staff/blog/timeline-trump-administrations-efforts-end-asylum>.

<sup>29</sup> Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, 84 Fed. Reg. at 47,150.

emanating from this administration, these suggested allegations of widespread fraud are completely lacking in evidentiary support.<sup>30</sup> In the past, the administration has had no issue misleading Congress and the public with inaccurate or incomplete data in order to perpetuate their anti-immigrant agenda;<sup>31</sup> it is sadly no surprise that they attempt to do the same here.

#### **IV. Conclusion.**

For all of the reasons mentioned above, we strongly oppose the implementation of this rule. Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact us to provide further information.

Sincerely,

**National Immigrant Justice Center**  
A HEARTLAND ALLIANCE Program

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<sup>30</sup> Jose Magaña-Salgado, et al., *The Trump Administration's Manipulation of Data to Perpetuate Anti-Immigrant Policies* (Jan. 2019), [https://www.immigrantjustice.org/sites/default/files/content-type/research-item/documents/2019-01/NIJC-Policy-Brief\\_Trump-Data-Manipulation\\_Jan2019.pdf](https://www.immigrantjustice.org/sites/default/files/content-type/research-item/documents/2019-01/NIJC-Policy-Brief_Trump-Data-Manipulation_Jan2019.pdf).

<sup>31</sup> *Id.*



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2139

Comment Submitted by Reggie Smith

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## Submitter Information

**Name:** Reggie Smith

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## General Comment

Unfortunately, the immigration system is broken. Although the laws must be enforced, there is a backlog that cannot be ignored, and indeed an immigration reform must be implemented. However, taking away the ability to legally work in this Country from asylee seekers while waiting for the backlog cases to be processed is UNJUST. The government expects asylee seekers to obey the laws by not seeking government assistance when themselves cannot legally workthe 30-day processing for Employment Authorization is a reasonable time and should not be changed. This non-sense proposed policy is similar to covering the head with a blanket leaving the feet out, and vice-versa.

AR003882

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2140

Comment Submitted by Nancy Cook

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## Submitter Information

**Name:** Nancy Cook

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## General Comment

Please support President Trumps effort to check backgrounds of all immigrants seeking asylum to the U. S. A. in an effort to protect our citizens.

AR003883

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2141

Comment Submitted by Niki Bawa

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## Submitter Information

**Name:** Niki Bawa

**Address:**

1784 Dolores Street

San Francisco, CA, 94110

**Email:** nikibawa214@outlook.com

**Phone:** 5104232249

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## General Comment

Dear Sir/Madam,

I am a US citizen writing to oppose the Department of Homeland Security (DHS) proposal, "Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications," (8 CFR Part 208) on both humanitarian grounds and on the the grounds that it weakens our great nation while strengthening our enemies. A basic requirement for the limited number of asylum applicants attempting to seek shelter in our country is the ability to work. Hampering this ability does not help our country and only makes life unnecessarily difficult for those who are persecuted and seek our help. In addition, such a proposed rule change would reduce much needed revenue to the tune of \$118 million per year.

Finally, such a rule change is a sign to our enemies that we are a weak and scared country that is too downtrodden and meek to live up to our values and provide limited relief to those few who are in need. It makes a mockery of our great country that has been a beacon of strength and leadership to the world and instead makes us look like we are a cruel, barbaric nation that is unworthy of showing a bright future to the next generation. This plays into the hands of our enemies who like to think of us as nothing but primitive savages who are too uneducated to fulfill basic and rational obligations.

Therefore, I ask that you reject this proposal and maintain the pride, respect, and dignity of our great nation instead of succumbing to irrational fear. Thank you.

AR003884

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2142

Comment Submitted by Ellen Machemer

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## Submitter Information

**Name:** Ellen Machemer

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## General Comment

Please let the president keep us safe. Stop trying to sabotage him.

AR003885

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2143

Comment Submitted by Devin Anonymous

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## Submitter Information

**Name:** Devin Anonymous

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## General Comment

Delays in asylum seekers getting their work authorization (Employment Authorization Document or "EAD") approval, while they are here LEGALLY, can lead to: Food insecurity, Risk of homelessness/housing insecurity, Vulnerability to exploitation, trafficking, and underground economy risks, and a Loss of ability to support themselves and their families.

AR003886

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2144

Comment Submitted by Denice Brown-Sweeney

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## Submitter Information

**Name:** Denice Brown-Sweeney

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## General Comment

Arbitrary bureaucratic deadlines to vet asylum seekers endanger the U.S.A. This country deserves better.

AR003887

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2145

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

By having no deadline, a denial of work authorization can be extended too, adding to bureaucracy and loss of tax dollars. For that reason, I say no to the proposed rule, no to the removal of the 30 day deadline.

AR003888

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2146

Comment Submitted by Rebecca Rojas

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## Submitter Information

**Name:** Rebecca Rojas

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## General Comment

I write to you to express my comments on the new proposed rule to eliminate the 30-day processing times for initial employment authorization documents for asylum seekers. This rule does not appear to be in the spirit of humanitarian assistance to those fleeing persecution.

Because asylum seekers are not employment eligible until their application has been pending for 180 days, many meritless cases are adjudicated before this time and generally cases that have been pending for 180 days have merit. The proposed rule change appears to be part of this administrations efforts to make the US a hostile destination for families fleeing persecution.

Many individuals seeking asylum are families and the lack of income that this rule intends to inflict means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, allowing individuals to apply for employment authorization allows them to obtain drivers licenses, insurance and other necessary documents. This in turn protects US citizens by insuring that all drivers are properly vetted and insured.

This proposed regulation is not in the best interest of American citizens or immigrants and it appears to further the anti-immigrant sentiment that has sadly become a characteristic of this administration.

AR003889



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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d71-tz fj
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2147

Comment Submitted by Alicia Goiffon

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## Submitter Information

**Name:** Alicia Goiffon

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## General Comment

I'm signing this because these individuals need to work to support their families. They're coming to the US because the country in which they came from is laden with crime, poverty and often times war. Our ancestors did the very same thing and we have no right to deny them the right to work. Shame on the Trump administration.

AR003890

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6s-6lzl
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2148

Comment Submitted by Suzan DeSeguin-Hons

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## Submitter Information

**Name:** Suzan DeSeguin-Hons

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## General Comment

Under current regulations, asylum seekers are allowed to submit the I-765 application after 150 days, 30 days in advance of when they become eligible for work authorization. If USCIS needs more than 30 days to process work permit applications from asylum seekers, the logical solution is to allow asylum seekers to submit the I-765 earlier than the current 150 days.

AR003891

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2149

Comment Submitted by Molly Anonymous

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## Submitter Information

**Name:** Molly Anonymous

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## General Comment

As an immigration attorney who is constantly fighting for human rights, this proposed rule change is yet another example of a systematic effort on the government's part to deter asylum seekers and to limit the opportunities for immigrants.

This proposed rule change is part and parcel of this administration's effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

AR003892

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2150

Comment Submitted by Herb Elesh

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## Submitter Information

**Name:** Herb Elesh

**Address:**

5240 W Irving Park rd unit b

Chicago, IL, 60641

**Email:** Drewman411@hotmail.com

**Phone:** 7732838233

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## General Comment

Applicants do work many Americans don't do and are not dependent on U.S. government. Consistent with recent policy to emphasize avoiding public charge immigrants these workers are expected to stand on their own two feet. They already have to wait to apply for the work permit. That is enough of a delay. That protects from fraud. The system works as it is currently.

AR003893

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-jtug
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2151

Comment Submitted by Joy Ziegeweid

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## Submitter Information

**Name:** Joy Ziegeweid

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## General Comment

I am the supervising immigration attorney at the Urban Justice Center Domestic Violence Project. I am writing in my personal capacity; I represent survivors of domestic violence and trafficking, many of them seeking asylum. Do not remove the 30-day processing requirement for (c)(8) EADs. Asylum-seekers waiting for their cases to be decided need to work to support themselves and their families. The longer they wait without work authorization, the more vulnerable they are to hunger, ill health, homelessness, and exploitation and trafficking. Desperate to survive, they will work and make ends meet however they can, but providing work authorization promptly ensures that they are working on the books and paying taxes, which benefits everyone. The day that my clients receive their (c)(8) work authorization card is always a day of great joy and relief; finally, they are able to begin rebuilding and stabilizing their lives after surviving horrific persecution and trauma. Clients who are unable to work lawfully are more likely to rely upon charity and public services and more likely to experience problems with their mental and physical health.

AR003894

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<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6u-kv2o
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2152

Comment Submitted by Richard Fox

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## Submitter Information

**Name:** Richard Fox

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## General Comment

Our country is less safe today because of arbitrary bureaucratic timelines.

Its true! Instead of giving the Trump Administration enough time to thoroughly check the background of every asylum seeker, theyre being forced to cut corners and make America less safe, just because some bureaucrats wrote a ridiculous timeline.

Help President Trump and Ken Cuccinelli secure Americas safety.

Thankfully President Trump is fighting to undo this nonsense. But the radical Left is pushing back . They dont care that these radical restrictions jeopardize our national security or that they punish LEGAL immigrants for obeying our laws. They just want to keep them in place, all so they can keep our immigration system broken and undermine Donald Trumps presidency.

Thats why Im submitting a formal comment before the comment period closes FRIDAY and tell DC to help President Trump secure Americas safety by removing this arbitrary bureaucratic timeline.

AR003895

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d70-3hc4
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2153

Comment Submitted by Andrew Lee

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## Submitter Information

**Name:** Andrew Lee

**Address:**

4835 Cordell Ave. Apt. 316  
Bethesda, MD, 20814

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## General Comment

As a Christian, I follow the teaching of Matthew 25. Making this change goes against those teaching, specifically to welcome the stranger. There are many other passages that speak to how we treat those seeking our protection throughout not only The Bible, but many other sacred texts.

Beyond religion, this change goes against who we have always been as a people, and as a nation.

Please do not make this change. It is anti-Christian, and it is anti-American.

AR003896

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6t-o3li
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2154

Comment Submitted by Carl Swanson

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## Submitter Information

**Name:** Carl Swanson

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## General Comment

Give President Trump the time he needs to check illegals at the border

AR003897



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-hwvb
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2155

Comment Submitted by Carrie Herzog

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## Submitter Information

**Name:** Carrie Herzog

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## General Comment

I am writing today to voice my objection to this arbitrary bureaucratic timeline of thirty days. This time frame is ridiculous and puts unrealistic pressure on the screening of asylum seekers.  
In support of President Trump and his immigration stance,

AR003898

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2156

Comment Submitted by Patricia Perez-Jenkins

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## Submitter Information

**Name:** Patricia Perez-Jenkins

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## General Comment

People who come seeking asylum are some of the most vulnerable people in the world. They are seeking help because they are at risk of being killed or tortured. Our country has a history of failing to uphold our most cherished ideals: see our treatment of Native Americans, slavery, Jews in WWII, Japanese internment, deporting US Citizens who are brown, and many others. Do not continue to destroy the best ideals of our nation. We are the beacon of hope for many for a reason. Despite our many flaws as a nation we are able to correct our horrible history and do better. Asylum seekers absolutely deserve to be able to work and contribute while they await their decisions. They are not the bad guys, on the contrary they are the people who have been displaced in some cases by American's misguided foreign policy (whether intervening where they shouldn't or failing to intervene when they should). If asylum seekers are allowed to work and have their work permits quickly they can begin to contribute to the society they wish to belong to, they can support themselves and their families, they will not be public charges. Our nation was founded on people fleeing other nations for a variety of reasons. We have this beautiful diverse history. Do not let the worst of our nature be on the forefront. Let us be better than our history. Let us be more like those who fought for equality, like Martin Luther King Jr., Cesar Chavez, and countless others who stood and reminded us that we are better people.

AR003899

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<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2157

Comment Submitted by Lauren Fisher

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## Submitter Information

**Name:** Lauren Fisher

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## General Comment

This new rule would cause significant harm to people legally seeking refugee status, fleeing from violence and chaos. Asylum proceedings can take years, and applicants must have a way to support themselves. They need to have a way to eat and a place to live. Delaying work authorization forces refugees into the informal economy where they are more likely to be taken advantage of and vulnerable to human trafficking.

AR003900

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2158

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Removing this rule would be detrimental to the safety and livelihoods of asylum-seekers who are trying to get honest work and provide for themselves and their families. This leaves them vulnerable to unsafe, under-the-table work situations and trafficking.

AR003901

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6s-nu44
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2159

Comment Submitted by Gina Cipriano

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## Submitter Information

**Name:** Gina Cipriano

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## General Comment

Get the all borders secured. Stop any one coming to USA for 1 year or until borders are set up & controlled. We as Americans need to know if Democrats are with us. THE PEOPLE Keep our Citizens safe. No matter who's President!!

AR003902

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-ln00
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2160

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am a lawyer and an asylum seeker. My asylum case is still pending before Asylum Office for three years due to the backlog. I would not survive without work authorization. This regulation would devastate asylum seekers as they already have to wait 150 days to apply for work authorization. They will lose of ability to support themselves and their families. I, as an asylum seeker, would not study in a law school and support my family at the same time without work authorization. If USCIS need more time to adjudicate these cases, I recommend shortening the waiting time before asylum seekers are allowed to submit their applications. If they can apply earlier, USCIS easily adjudicate the application within 180-day time-frame as the current law dictates. Further, getting work authorization late would cause asylum seekers to not able to get a valid ID, a driver's license, an SSN, an healthcare. These would harm the society and asylum seekers as well.

AR003903

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2161

Comment Submitted by Victoria Baratian

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## Submitter Information

**Name:** Victoria Baratian

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## General Comment

Please see attached my comment in opposition to Proposed Federal Rule Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications, DHS Docket No. USCIS-2018-0001.

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## Attachments

EAD comment

AR003904

November 8, 2019

*Submitted Via Federal e-Rulemaking Portal*

Victoria Baratian  
Staff Attorney  
Central West Justice Center  
Worcester MA 01608

**RE: Opposition to Proposed Federal Rule “Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications,” DHS Docket No. USCIS-2018-0001**

Dear Ms. Deshommes,

I am writing to voice my strong opposition to Proposed Federal Rule “Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications,” DHS Docket No. USCIS-2018-0001.

I am a legal aid attorney in the immigration unit in Worcester, MA. We provide free civil legal aid to low income members of our community. Additionally, I am a first generation American and have seen first hand the hard work and struggles of the immigrant communities in my family and loved ones.

The Proposed Rule will have significant and long-lasting negative effects on the ability of Central West Justice Center’s asylum clients to support themselves and their loved ones while they are waiting for their claims to be heard. By definition, an asylum seeker is an individual who has suffered grave harm, including torture and sexual violence on account of a statutory protected ground, and who flees his or home country with very few possessions and little support or financial resources. Asylum seekers turn to the U.S. for a safe haven and protection. This rule to eliminate the 30-day processing time for work authorization will undermine asylum seekers’ abilities to sustain themselves. The proposed rule change will allow DHS to have unlimited time to decide if and when asylum seekers will be issued work authorization, during which time asylum seekers would have no means of supporting themselves and be forced to wait and survive on the charity of others. The Rule will only compound the devastating delays that many asylum seekers face. DHS, which suffers backlogs in almost every benefit category, will have no incentive to issue a prompt decision.

Further, the Rule is not in the economic interest of the United States which benefits greatly from the contributions of refugees and asylum seekers. It compounds the impact of the already lengthy 180-day waiting period before asylum seekers are eligible for work authorization and is unnecessary given that DHS has shown itself capable of near complete compliance with the 30-day adjudication requirement. DHS’s argument that the proposed rule is due in part to fraud concerns is contradictory since DHS should want to expedite EAD determinations and quickly vet applications, as it currently does, to detect and investigate any concerns about applications rather than create extensive delays.

Ensuring that asylum seekers can secure lawful employment as soon as possible is in the economic interest of the United States. According to the Department of Health and Human Services, refugees and their family members contributed more than \$343 billion in revenue to

AR003905



federal, state and local coffers. On balance, refugees contributed \$63 billion more than they received in benefits from various programs. The U.S. economy benefits greatly from this population that works so hard when given a chance and permission to work. According to the Brookings Institute, refugees and asylum seekers engage in entrepreneurship at much higher rates than U.S. born individuals. In the U.S., for example, while immigrants are 15 percent of the population, they represent 25 percent of entrepreneurs. Small businesses and the jobs they create are the engines of growth, innovation, and economic stability of the United States.

Eliminating the 30-day adjudication requirement would result in extensive waiting periods for asylum seekers to be issued employment authorization. Asylum seekers already bear the burden of government back-logs and adjudication delays. Even with a return to the Asylum Office's processing of First in, First out, asylum applicants face great difficulties in getting their cases heard. When a decision on an asylum seekers case is delayed, it negatively impacts their ability to provide for themselves, support family, and build a life here in the United States. Many asylum seekers wait months, if not years, for their cases to be heard and then adjudicated.

Asylum seekers are already required to wait a lengthy period of 180-days before they are eligible for work authorization. During this time, as mentioned above, they rely on others for support to survive. Removing the 30-day processing time requirement would cause significant harm to already vulnerable individuals. Without a time limit for processing initial applications, DHS would have no incentive to adjudicate these cases in a timely manner and asylum seekers who are statutorily eligible to work would be unable to do so for an unknowable period of time.

DHS's near complete compliance with Rosario demonstrates that it is capable of adjudicating these applications within 30 days of filing. In July 2018, the U.S. District Court for the Western District of Washington ruled that USCIS must adjudicate asylum seekers' initial applications for employment authorization within 30 days, as is specified at 8 C.F.R. 208.7(a)(1). As part of the ruling, USCIS was ordered to submit status reports indicating compliance with the 30-day adjudication requirement. In August 2019, DHS reported that it has been adjudicating 99% of asylum seekers' initial applications for employment authorization within 30 days.

DHS's concerns related to asylum fraud are unfounded given its robust system of security checks and fraud detection. DHS voiced concern about fraud and national security related to the adjudication of EADs based on asylum applications. However, DHS currently has a robust system of security checks and experienced officers trained in detecting fraud. If DHS has a concern about an individual, then it should quickly process and investigate the application, rather than create delays. As mentioned above, DHS currently decides over 90% of the EAD applications within the 30-day processing timeline, demonstrating that DHS is able to address fraud and security concerns within the current timeframe and process.

Without the 30-day processing requirement, EAD applications from asylum seekers will be delayed indefinitely. Without access to work authorization, asylum seekers will not have the ability to support themselves and their families, build their lives, and contribute to our local economies. PAIR clients will lack government-issued identification that helps them integrate into life in the United States. The right to seek safety and protection in the United States is unequivocal. By decreasing access to the tools that allow asylum applicants to meet their basic needs while waiting for decisions on their claims, the proposed rule is undercutting that fundamental right. Because this proposed rule change places a

serious burden on the most vulnerable immigrants, we strongly oppose the proposed regulation and request that it be withdrawn.

I respectfully request that USCIS continue processing asylum-based EAD applications pursuant to its current policy and practices that require adjudication within 30 days of filing.

Sincerely,

Victoria Baratian

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-ukrf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2162

Comment Submitted by Edward Farrell

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## Submitter Information

**Name:** Edward Farrell

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## General Comment

I am writing in opposition to the proposed elimination of the regulation requiring adjudication of asylum seekers EAD applications within 30 days of submission.

The purpose of eliminating the regulation is to have more time to adjudicate the EAD requests. A better solution would be to accept EAD applications earlier, and then increase the adjudication time, so that asylum seekers can have work authorization in accordance with the statute, as required by Congress.

Asylum seekers need to work in order to support themselves and their families while waiting for decisions on their cases. The statute requires that they be given an opportunity to apply for work authorization. It is not appropriate for regulations to undermine the will of Congress, which has authority to write the laws the govern our country.

AR003908

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d71-lxvg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2163

Comment Submitted by Janice Schroeder

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## Submitter Information

**Name:** Janice Schroeder

**Address:**

1610 Curtis St.  
Berkeley, CA, 94702

**Email:** janicejimschroeder@gmail.com

**Phone:** 510 524-2724

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## General Comment

Dear Sirs:

I urge you not to remove a 30-day processing provision for asylum applicants. I am currently retired, but while providing support services to adult students I was witness to the very negative impacts removing a 30-day processing provision would have on asylum seekers and their families. Asylum seekers would not only lose wages and benefits, but all areas of the US government would also lose taxable revenue. As an alternative, I encourage the USCIS to allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

Thank you for considering my comments.

Sincerely,

Janice Schroeder

AR003909

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d6v-xwwl
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2164

Comment Submitted by Patricia Noonan

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## Submitter Information

**Name:** Patricia Noonan

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## General Comment

Our President is a brilliant man who wants to protect our country and our people. He is trying to keep out undesirables and needs time to check the people who want to take advantage of the free ride. We the people are sick of supporting the world while American families do without. Shape up Democrats. We know your goals are illegal votes by illegal voters.

AR003910

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6x-7cfc <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2165

Comment Submitted by Linda Nichols

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## Submitter Information

**Name:** Linda Nichols

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## General Comment

We must have the time to completely check out a person before letting them come into the USA. Otherwise it could and has t led to people killing USA people. Thank you!

AR003911

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d73-ih5f <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2166

Comment Submitted by David Schlicker

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## Submitter Information

**Name:** David Schlicker

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## General Comment

Support Trumps immigration reform.

AR003912

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d71-k356
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2167

Comment Submitted by Paul and Sally Westermeyer

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## Submitter Information

**Name:** Paul and Sally Westermeyer

**Address:**

1240 W. Belmont

Roseville, MN, 55113

**Email:** pwesterm@luthersem.edu

**Phone:** 651-644-3865

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## General Comment

We oppose the proposal to remove the 30-Day processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications. This proposal not only counter-productively denies tax revenue, but it is cruel and unjust to those who need to be helped and whom we should be helping.

AR003913



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-p0t9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2168

Comment Submitted by Ronald Blount

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## Submitter Information

**Name:** Ronald Blount

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## General Comment

Tell all Republicans to get off their rear end and go after the democrats full force and quit being such a baby. Most of the democrats Marxist Socialist Communists should be in jail for what they did to President Trump and charged with Treason.

AR003914

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 08, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d70-q7gg
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2169

Comment Submitted by Alexander Vernon

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## Submitter Information

**Name:** Alexander Vernon

**Address:**

651 E. Jefferson Ave  
DETROIT, MI, 48226

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## General Comment

Delaying work authorization for legal applicants for asylum is a cruel and cynical way to push people into economic dependency, precarious "under the table" employment, or simply giving up on the legal process of applying for Asylum protection.

AR003915

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d70-e318
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2170

Comment Submitted by Tj Mills

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## Submitter Information

**Name:** Tj Mills

**Address:**

475 Riverside Drive, #1505

New york, NY, 10115

**Email:** tmills@umcmmission.org

**Phone:** 2128703507

---

## General Comment

Asylum-seekers are entitled to be in the US under int'l and US law. Receiving countries are legally, morally bound to provide such persons the means to survive economically while their petitions proceed. Regulations that impose a 150 day waiting period prior to seeking an employment document were already in violation of the UN convention. To eliminate the 30 day processing period serves no legitimate purpose-- i.e., has no deterrent effect (these are legitimate asylum-seekers who have already filed their petitions and have already waited 150 days since filing) so defies logic. The rule punishes the persons among us (victims of unspeakable acts of persecution) who need help the most AND, importantly, are willing to help themselves if they have a timely issued work permit.

AR003916

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-7dyx
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2171

Comment Submitted by Heidi Quayat

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## Submitter Information

**Name:** Heidi Quayat

**Address:**

2950 Metro Drive

Suite 201

Bloomington, 55425

**Email:** heidi@karamlaw.com

**Phone:** 9528543313

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## General Comment

Thank you for taking the time to read my comment on this proposed regulation. I am an attorney practicing in the Minneapolis area of Minnesota. Although I work in the immigration field, I work primarily with immigrants applying for business visas, rather than those applying for asylum. One of the reasons why I do not work with immigrants applying for asylum is because they generally do not have the resources to compensate attorneys fairly for effective work. This proposed rule would leave these people with even fewer resources to seek urgently-needed professional help and provide for their basic needs, such as food, clothing, and shelter.

The things happening right now within the immigration system shock me as an American and conservative Republican. I grew up believing in the Republican ideals of hard work and opportunity. As I get older, I realize that there is often no reward for hard work and no opportunity for asylum seekers who come here, encouraged by the US's traditional philosophy that we accept the tired, poor, and the huddled masses yearning to breathe free. The country I see now is not the same one that inspired me when I was young. Instead, it daily makes me sad and angry to see how far it has drifted away from its better angels.

Two weeks ago, I saw what looked like a Syrian family begging for food next to the supermarket where I shop. The family included a mother and father, both of working age, and two small children. It is rules like this one that cause things like this to happen. I am appalled that my country creates obstacles to prevent these desperate people from working, especially when our national unemployment rate is at 3.6%.

I strongly urge the agency to consider AILAs proposed alternative rule to shorten the waiting time before asylum

AR003917

seekers can submit their applications for work authorization instead of eliminating the requirement that USCIS adjudicate timely filed work authorization requests within 30 days.

It is rules like these that turn conservative evangelicals like me against the Trump administration and cause me to vote for Democrats. Since the Republicans have started creating rules like these, I cannot support them. Until this harmful philosophy of penalizing asylum seekers changes, I will be voting blue every November. Among my friends and relatives, I see indications that the tide of evangelical support is turning with me.

AR003918

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6s-2fk9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2172

Comment Submitted by Kay Walker

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## Submitter Information

**Name:** Kay Walker

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## General Comment

Please write your comment here.

We need to do everything possible to stop this illegal immigration problem. It is destroying our cities and our entire country!

AR003919

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-8u80
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2173

Comment Submitted by John Martineau

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## Submitter Information

**Name:** JOHN MARTINEAU

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## General Comment

Don't make the mistake of assuming that everybody who comes to this country is an innocent asylum seeker - a good person. We MUST allow ample and sufficient time to properly vet each applicant.

AR003920

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-6u2w
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2174

Comment Submitted by Elaine Barnes

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## Submitter Information

**Name:** Elaine Barnes

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## General Comment

Please help President Trump secure Americans safety by removing the timelines

AR003921



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6s-iu9g
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2175

Comment Submitted by Ellen Weintraut

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## Submitter Information

**Name:** Ellen Weintraut

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## General Comment

I am an immigration attorney and the owner of Northwest Immigration Law, PLLC, a immigration law firm in Fayetteville, AR. I work a great deal with asylum seekers. I am writing on behalf of my clients to ask that you keep the 30 day processing requirement.

Immigration clients already see a growing backlog in their pending applications. Asylum seekers especially can wait years to have a decision on their case. They are required to wait five months before they seek employment authorization. It is fair to process the applications in a timely manner after that delay. Removing the 30 day processing requirement would severely impact these individuals who rely on work authorization to seek employment, obtain driver's licenses, seek emergency assistance, and many more necessary activities.

Asylum seekers, like other immigrants, contribute to our economy. We should not limit their ability to work lawfully. These are people who are fleeing persecution in their home countries. They deserve to be treated fairly. If USCIS needs additional time to process these applications, asylum seekers should be given the chance to apply earlier than 150 days after they apply for asylum.

Thank you for your attention to this matter.

AR003922

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d71-cjj2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2176

Comment Submitted by Chris Jackson

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## Submitter Information

**Name:** Chris Jackson

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## General Comment

I am a US citizen who opposes this proposed rule, because I think immigrants whose cases are prnding should be able to work. Their families are much more secure this way, and they are less likely to need public assistance.

AR003923

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2177

Comment Submitted by Amy Anonymous

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## Submitter Information

**Name:** Amy Anonymous

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## General Comment

This administration does not have a clue what asylum means. These people are coming to our border fleeing their homes and leaving everything theyve ever known because the conditions where they used to live are horrid. We need to have empathy and be the America we used to be. This law cannot and should not be gutted by the worst excuse of a leader this country has ever known.

AR003924

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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2178

Comment Submitted by Karen Sandness

---

## Submitter Information

**Name:** Karen Sandness

**Address:**

4261 Sheridan Avenue South, Apt 407

Apt 407

Minneapolis, 55410

**Email:** ksandness@comcast.net

**Phone:** 6129268371

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## General Comment

The asylum seekers are fleeing situations that most Americans cannot even imagine. However, since these applications can get bogged down in the courts, the asylum seekers need to support themselves and their families while awaiting a decision.

These are not "criminals." These are people who were respectable citizens in their home countries but were forced to flee due to war, anarchy, or government repression.

Let us continue being "the home of the free."

AR003925

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2179

Comment Submitted by Arnold Jochim

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## Submitter Information

**Name:** Arnold Jochim

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## General Comment

Supporting President Trumps immigration reforms is one f the most positive actions you can take to help preserve the United States of America. The people of this country support immigration, but they support rational, affordable measures.

Money to support all the programs of our country is not easily come by, especially with individual and groups willing to waste and be unrealistically about our sources. Surely, you, as an intelligent, concerned citizen fully understand the needs and problems. Support President Trumps immigration reforms!

AR003926

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2180

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am a lawyer who represents asylum seekers. This proposal clearly is intended only to make the process harder for asylum seekers in the process and harm their cases. seekers without benefit to anyone else. Leaving people who are legitimately seeking asylum without a means to support themselves is counterproductive and designed to result in people who want to comply with our legal process instead being literally forced through desperation and the need to survive to instead break the law. This is a cynical attempt by the administration to disadvantage asylum seekers in their cases. I object to the adoption of this regulation change.

AR003927

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-r1vn
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2181

Comment Submitted by Liana Montecinos

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## Submitter Information

**Name:** Liana Montecinos

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## General Comment

Do the right thing and allow people the opportunity to work and put food on the table for their families. Anything else is cruel and inhumane.

AR003928

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6t-ftvt
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2182

Mass Mail Campaign 2: Comment Submitted by Lutetia Vollintine (Total as of 11/13/2019: 282)

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## Submitter Information

**Name:** LUTETIA VOLLINTINE

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## General Comment

Please support President Trump's Immigration Reforms or else

AR003929



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6t-k4ot <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2183

Comment Submitted by Matthew Weisner

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## Submitter Information

**Name:** Matthew Weisner

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## General Comment

Please dont end the 30-day processing of employment authorization documents for asylum seekers. This will not only harm asylum seekers and their families, but will also harm all domestic born Americans. It will reduce tax revenue, jeopardize public health, and hurt employers who rely on immigrant workers to support their businesses. This is bad policy pure and simple.

AR003930

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d70-k7o2 <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2184

Comment Submitted by Paula Peters

---

## Submitter Information

**Name:** Paula Peters

**Address:**

15 McKendree Ave  
Annapolis, MD, 21401

**Email:** Pollypeters@verizon.net

**Phone:** 4107037060

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## General Comment

I am vehemently against this rule change. It makes nonsense to stop people from supporting their families. We will lose all the tax money we now get coming from their wages.

AR003931

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2185

Comment Submitted by Michael Schmidt, New York Department of Taxation and Finance

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## Submitter Information

**Name:** Anonymous Anonymous

**Submitter's Representative:** Karry Culihan

**Government Agency Type:** State

**Government Agency:** NYS Department of Taxation and Finance

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## General Comment

See attached file.

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## Attachments

Dept. of Tax&Finance Comment on 30 day EAD rule elimination

AR003932



## Department of Taxation and Finance

MICHAEL R. SCHMIDT  
Commissioner

November 7, 2019

Samantha Deshommes, Chief  
Regulatory Coordination Division  
Office of Policy and Strategy  
United States Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, DC 20529-2140

Re: DHS Docket No. USCIS-2018-0001

Dear Chief Deshommes:

The New York State Department of Taxation and Finance ("NYSDTF") has reviewed the Department of Homeland Security's ("DHS") Notice of Proposed Rulemaking, Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, published September 9, 2019, in the Federal Register, Vol. 84, No. 174. NYSDTF respectfully opposes the proposed rule change and urges that the proposed change be withdrawn or modified so as not to negatively impact federal, state and local tax revenues.

DHS's proposed change removes a regulatory provision stating that U.S. Citizenship and Immigration Services (USCIS) has 30 days from the date an asylum applicant files the initial Form I-765 to grant, or deny, the application. Without a stated timeframe for decision, this change would undoubtedly increase the amount of time asylum applicants must wait in order to receive an Employment Authorization Document (EAD) and would limit asylum seekers' ability to earn income while awaiting a decision on their asylum application.

As recognized by DHS in its notice, such delays would result in employment tax losses to federal, state and local governments. Based on DHS's own estimates, the federal employment tax losses from this proposed rule change will range from \$39.15 million to \$118.54 million annually. Not only would these federal losses likely affect aid to states, but New York State would additionally suffer its own state-specific employment tax losses. New York State is home to almost 10% of all approved asylum seekers<sup>1</sup>, and based on DHS's own figures, New York State estimates annual state employment tax losses between \$1.3 million to \$4 million on top of lost federal tax dollars if this proposed rule change is implemented.

DHS's own assessment concludes this proposed rule change will negatively affect tax revenues on both the federal and state levels. NYSDTF agrees. New York State will suffer millions of dollars in annual revenue losses if EAD decisions are delayed beyond the current 30-day window for action. Accordingly, NYSDTF respectfully requests that DHS withdraw the proposed rule change or modify it so as to minimize such losses.

Sincerely,

Michael R. Schmidt  
Commissioner

<sup>1</sup> [https://www.dhs.gov/sites/default/files/publications/Refugees\\_Asylyees\\_2017.pdf](https://www.dhs.gov/sites/default/files/publications/Refugees_Asylyees_2017.pdf)

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2186

Comment Submitted by Nancy Jones

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## Submitter Information

**Name:** Nancy jones

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## General Comment

Please support donald Trump and remove this arbitrary bureaucratic timeline to keep America safe. I used to be democrat but I am no more. Tired of the things you are doing to make our country fail. I dont think you care

AR003934

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6u-rqc3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2187

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the Department of Homeland Security (DHS) proposal to remove the requirement to adjudicate initial Form I-765, Application for Employment Authorization (EAD applications for pending asylum applicants within 30 days from the filing date.

First, DHS does not propose an alternative timeframe. Therefore, the DHS proposal means that DHS could take an indefinite amount of time to adjudicate work authorization applications of asylum seekers. This is the very problem that led to the Rosario v. USCIS case in which a judge ruled delays as unreasonable and mandated the 30-day deadline from date of filing the application. (See <https://americanimmigrationcouncil.org/news/judge-rules-uscis-must-adjudicate-employment-authorization-asylum-seekers-within-30-days>)

Second, as it is, asylum seekers must wait 150 days after filing their asylum applications to apply for work authorizations. For at least 180 days, DHS prevents asylum seekers from earning an income for they and their families and to contribute as productive members to the economy of the United States and society. Moreover, without income, the current president and his administration could deem these asylum seekers as public charges as asylees face insecurity to food, housing, healthcare humanitarian rights and goods.

Third, the USCISs Proposed Rule document claims a backlog of applications and under staff to meet the timeframe demands. This is an ongoing claim that USCIS has claimed for decades. Yet, DHS did not assess the cost to hire more staff as stated, USCIS has also not estimated the cost impacts that hiring additional officers (DHS, Sec. II, C). In addition, DHS did not calculate the exact monetary income loss to the asylees nor the personal mental anxiety in awaiting a decision. (<https://www.regulations.gov/document?D=USCIS-2018-0001-0001>)

Fourth, the DHS Budget-in-Brief: Fiscal Year 2019 does not allot for USCIS additional staff. However, \$1,600 million is for a new border wall system (p. 29) of which the president said that Mexico was to bare the cost. Another \$2,755.5 million is for Immigration Custom Enforcement Detention Bed Funding (p.36). There are more

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cost-effective ways to handle undocumented immigrants, which DHS should consider instead of wasting tax payers hard-earned dollars. All presentation of change proposals ought to include all calculated costs and alternative. (<https://www.dhs.gov/sites/default/files/publications/DHS%20BIB%202019.pdf>)

Lastly, immigrants and asylum seekers would rather stay in their native homes instead of uprooting themselves and their families. It is difficult to be an immigrant. Please know that many immigrants and asylees are highly educated with licensed or certified professions that can help the United States. The proposed elimination of the 30-day timeframe is harmful.

Thank you for your time and attention to my comments.

AR003936

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2188

Comment Submitted by James Young

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## Submitter Information

**Name:** James Young

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## General Comment

President Trump's Immigration Reforms must be supported ! Thank you,

AR003937



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2189

Comment Submitted by GCC Garland

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## Submitter Information

**Name:** GCC Garland

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## General Comment

Please properly vet those we catch, there are already so many that we do not... And if you can not do it out of love for your country, please do it out of love for your own family, it could be that they are the ones affected next.

AR003938

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2190

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I believe Asylum seekers should be allowed to work. They come to the US looking for help and for a better life. We should not give our backs to no one who seeks help. Everyone should be treated equally no matter where they come from. No one should be denied a job offer.

AR003939

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2191

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This proposed rule does not make sense nor fit with the US's immigration goals. This rule would allow the government to indefinitely hold an employment application for seemingly no reason. If the government is so focused on getting people to work, then doing away with this rule is in direct contravention to that goal.

AR003940

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2192

Comment Submitted by James Bell

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## Submitter Information

**Name:** James Bell

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## General Comment

To whom it may concern:

I am writing to you to request that you do not remove the 30 day processing provision for Asylum Applicants. There are many legitimate reasons that immigrants come to this country due to violence, natural disasters, freedom from religious, ethnic and political persecution, sexual orientation, etc. in their home countries. These asylum seekers are a great benefit to the USA and should be given every opportunity to live here legally and benefit from the 30 day processing provision.

Thank you,  
James F. Bell

AR003941

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d73-wc4y <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2193

Comment Submitted by Helen Fox

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## Submitter Information

**Name:** Helen Fox

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## General Comment

President Trump needs more time than just a month. Let HIM decide how to do this; he always knows best. He will know what to do. We need to get this done. Thank you.

AR003942

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2194

Comment Submitted by Robert Setchfield

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## Submitter Information

**Name:** Robert Setchfield

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## General Comment

The USCIS' proposal to eliminate the 30-day processing regulation for initial asylum work permits is simply another validation that Trump and the hard right are not only interested in limiting illegal immigration but also legal immigration. It's painful to watch this continued attack on the foundations of inclusion that this country is built on.

Please help to insure that asylum seekers have a fair opportunity at freedom and the opportunity to contribute to our great country. Our country is at it's best when we are able to come together...all races...all genders.

Thanks for your help.

AR003943

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2195

Comment Submitted by Mary Giovagnoli, Kids in Need of Defense

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## Submitter Information

**Name:** Mary Giovagnoli

**Address:**

Washington, DC, 20015-1902

**Email:** mgiovagnoli@supportkind.org

**Submitter's Representative:** Mary Giovagnoli

**Organization:** Kids in Need of Defense

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## General Comment

Please see attached

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## Attachments

KIND Final EAD Comment

AR003944



November 8, 2018

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Avenue NW  
Mailstop #2140  
Washington, D.C. 20529-2140

RE: DHS Docket No. USCIS-2018-0001: Comment to Notice of Proposed Rulemaking by U.S. Citizenship and Immigration Services

Dear Ms. Deshommes:

Kids in Need of Defense (KIND) respectfully submits this comment on the September 9, 2019, Notice of Proposed Rulemaking for “Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications” (“Proposed Rule”).<sup>1</sup> The government seeks to remove the 30-day processing requirement (“30-Day Requirement”) for a work authorization document (“EAD”). If finalized, the Proposed Rule would allow U.S. Citizenship and Immigration Services (“USCIS”) to indefinitely delay the adjudication of work authorization requests, which would leave asylum seekers, including children, without access to identification, employment opportunities, and services that are critical to their stability and well-being during an increasingly protracted asylum process. USCIS fails to provide a reasoned analysis for its departure from the 30-Day Requirement; ignores the heavy reliance interest on the timely receipt of an EAD; and, in so doing, violates the Administrative Procedure Act. Accordingly, KIND urges USCIS to withdraw the Proposed Rule.

KIND is a national nonprofit organization dedicated to providing free legal representation and protection to unaccompanied immigrant and refugee children in removal proceedings. Since January 2009, KIND has received referrals for more than 20,000 children from 70 countries; and has administered training more than 42,000 times to attorneys working to represent such children. KIND has field offices in ten cities: Los Angeles, San Francisco, Atlanta, Baltimore, Boston, Houston, Newark, New York City, Seattle, and Washington, DC. Legal services professionals who serve children through KIND provide defense in removal proceedings and pursue immigration benefits and relief for which their clients may be eligible. KIND also employs social services coordinators throughout the country, providing unaccompanied children with the support they need outside of the courtroom.

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<sup>1</sup> Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, 84 Fed. Reg. 47,148 (Sept. 9, 2019) (to be codified at 8 C.F.R. Part 208).



Many of KIND's clients have fled severe violence and threats to their lives in their countries of origin and may be eligible for asylum. Upon arriving in the United States, they confront numerous challenges, from learning a new language to healing from traumatic experiences and preparing their legal cases for protection. Unaccompanied children<sup>2</sup> frequently have limited or no financial resources or other support to assist in navigating these hurdles; many are too young to work at all. For these children, an EAD provides critical benefits above and beyond access to lawful employment: The EAD is a critical form of identification that is frequently necessary to access support services and meet their basic needs as they heal from violence and adapt to a new community. For example, an EAD (or social security number) may be necessary to open a bank account, secure housing, apply for state health and mental healthcare programs, or enroll in higher education. As the time period for adjudication of asylum applications has grown, the importance of a predictable EAD process has also increased.

Contrary to the underlying goal of the 30-Day Requirement, the Proposed Rule would exacerbate the vulnerability of asylum seekers, and unaccompanied children in particular, by imposing additional financial and other burdens on them as the consequence of the government's inability to timely adjudicate asylum claims. The government has not adequately articulated a reasoned basis for abandoning the rationale that led to the prior regulation and shifting the burden onto applicants, particularly children.

#### **I. The Proposed Rule Violates the Administrative Procedure Act ("APA").<sup>3</sup>**

The Proposed Rule, if adopted, represents an arbitrary and capricious exercise of authority by the government, and is thus in violation of the Administrative Procedure Act, which requires the government to provide a well-reasoned and factual basis for proposed rulemaking.<sup>4</sup> Where an agency is reversing itself on a subject of a prior rulemaking, it must "provide a more detailed justification than what would suffice for a new policy created on a blank slate" when the new regulation "rests upon factual findings that contradict those which underlay its prior policy," when "its prior policy has engendered serious reliance interests that must be taken into account," and in some other circumstances.<sup>5</sup> In this case, USCIS offers a narrow and limited analysis of its basis for eliminating the 30-Day completion requirement, ignoring significant historical, practical, and humanitarian reasons for maintaining the existing rule. First, USCIS provides no basis for departing from the long-standing 30-Day Requirement which is grounded in a balancing of administrative needs against individual welfare, and in which serious reliance interests have attached. Second, USCIS fails to sufficiently evaluate obvious administrative alternatives to and costs of the Proposed Rule. Finally, evaluation of the government's

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<sup>2</sup> "Unaccompanied alien child" is defined at 6 U.S.C. § 279(g)(2).

<sup>3</sup> 5 U.S.C. §§ 553, 706(2)(A) (2018).

<sup>4</sup> *Dept. of Commerce v. New York*, 139 S.Ct. 2551, 2567 (2019). "The Administrative Procedure Act embodies a 'basic presumption of judicial review,'" *Abbott Laboratories v. Gardner*, 387 U.S. 136, 140 (1967), and instructs reviewing courts to set aside agency action that is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law," 5 U. S. C. § 706(2)(A).

<sup>5</sup> *FCC v. Fox Television Stations, Inc.*, 556 U.S. 502, 515 (2009).

reasons here is impossible without considering a separate forthcoming rulemaking that is only tangentially referenced in this proposal.

*A. USCIS Fails to Evaluate Key Factors of the Long-Standing 30-Day Requirement.*

1. USCIS Provides No Justification for its Departure from the 30-Day Requirement's Humanitarian Purpose.

Under the “Asylum Reform” regulations promulgated in 1994, the Department of Justice (DOJ) (in which the Immigration and Naturalization Service (INS) was housed) crafted a streamlined process for conducting asylum adjudications, balancing a need to address a rapidly increasing backlog of applications against the hardship imposed on asylum seekers when their applications were unduly delayed.<sup>6</sup> Most notably, DOJ believed that the ability to apply for asylum and an employment authorization document simultaneously created a magnet for possible fraud, swamping the newly created Asylum Offices with applications filed solely for the basis of obtaining an EAD.<sup>7</sup> At the same time, however, the Department recognized the hardships imposed on asylum applicants who were unable to support themselves or their families absent work authorization. After numerous discussions with the public and robust public comments, DOJ developed a compromise position that traded a promise of timely and efficient adjudication against a limit of 180 days against which an asylum applicant would have to go without work authorization.<sup>8</sup> Under the provisions of the 1994 rule, an asylum seeker whose case had not been completed at the 150-day mark could file for work authorization. The INS was then obligated to process the EAD application within 30 days. The supplemental discussion accompanying the proposed 1994 rule noted that this wait time represents the *absolute limit* of acceptable delay from legacy INS: “[I]deally, few applicants would ever reach the 150-day point” because the underlying application would have been adjudicated by then.<sup>9</sup>

More than two decades later, the court in *Rosario v. USCIS* reiterated the importance of this principle when it ordered USCIS—which had inherited the Asylum Office functions—to comply with the 30-day processing requirement in a class action lawsuit brought by asylum seekers whose employment authorization applications were pending beyond the 30 days. In doing so, the court remarked that it was “abundantly clear” that a lengthy asylum process demands prompt adjudication of EAD applications so asylum seekers can support themselves. In fact, it noted that the INS committed to adjudicating applications for employment authorization regardless of the merits of the underlying asylum claim precisely because of the equities involved in delaying an individual a livelihood while awaiting a decision. As the court concluded, “This elevation of the 30-day deadline above the merits of the underlying

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<sup>6</sup> Rules and Procedures for Adjudication of Applications for Asylum or Withholding of Deportation and for Employment Authorization, 59 Fed. Reg. 14779 (Mar. 30, 1994) (proposed rule); 59 Fed. Reg. 62297 (Dec. 5, 1994) (final rule).

<sup>7</sup> David A. Martin, Symposium, *Making Asylum Policy: The 1994 Reforms*, 70 Wash. L. Rev. 725 (1995).

<sup>8</sup> *Id.* at 754.

<sup>9</sup> 59 Fed. Reg. at 14780.

asylum claim reflects. . . that the balance of equities has been struck in favor of adhering to the deadline so that applicants can obtain employment authorization.”<sup>10</sup>

USCIS barely acknowledges this animating principle. Only once does the Proposed Rule address the original rationale for timely EAD adjudication of ensuring applicants could support themselves, asserting that “the existing 30-day timeframe has become untenable notwithstanding its humanitarian goals.”<sup>11</sup> Because USCIS does not elaborate on this point, failing to address why the humanitarian justification is no longer sufficient to justify the exertion of agency effort, the Proposed Rule is arbitrary and capricious.<sup>12</sup>

## 2. USCIS Ignores Serious Reliance Interests in the 30-Day Requirement.

Asylum-seekers have come to rely on timely approval of EAD applications to survive during the ever-longer application process: they expect that the government will not indefinitely deprive them of means to support themselves. In addition to these interests, service providers like KIND have established programs, services, training, expectations, social services support models, and other activities in reliance on USCIS’s timely processing of EADs while cases are pending. In this circumstance, the Supreme Court made clear in *Fox Television Stations*, the burden is on the government to provide a “detailed justification” for the proposed policy shift, over and above what would be required if the agency were writing on a “blank slate.”<sup>13</sup> Here, USCIS *entirely* fails to justify undermining asylum-seekers’ and service providers’ reliance interest in the 30-Day Requirement. As discussed further below, that interest extends not only to a timely and prompt adjudication but also to the provision of the EAD as a document that allows an asylum-seeker to unlock other necessary documents and services. The rationale provided for the Proposed Rule is therefore plainly deficient under the APA.

### B. USCIS Fails to Meaningfully Consider Alternatives to the Proposed Rule and Its Costs.

#### 1. The Proposed Rule Does Not Reasonably Consider Alternatives to the 30-Day Requirement.

Accounts of the evolution of the 1994 asylum reforms place a heavy emphasis on the cooperative and deliberative nature of the process, in which the government sought out a wide range of opinions and solutions in order to address the asylum backlog and EAD conundrums of the time. In contrast, the Proposed Rule casually dismisses or ignores alternatives with no opportunity for thoughtful discussion.

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<sup>10</sup> 365 F.Supp.3d 1156, 1161 (W.D. Wa. 2018).

<sup>11</sup> Proposed Rule at 47,153 n.11.

<sup>12</sup> See *Encino Motorcars, LLC v. Navarro*, 136 S. Ct. 2117, 2126 (2016) (unexplained inconsistency in agency policy is “a reason for holding an interpretation to be an arbitrary and capricious change from agency practice”) (quoting *Nat’l Cable & Telecommunications Ass’n v. Brand X Internet Servs.*, 545 U.S. 967, 981 (2005)).

<sup>13</sup> *F.C.C. v. Fox Television Stations, Inc.*, 556 U.S. 502, 515 (2009); *Encino Motorcars*, 136 S. Ct. at 2126 (an agency must be “cognizant that longstanding policies may have engendered serious reliance interests that must be taken into account” (internal quotation omitted)).

For instance, the possibility of an alternate 90-day timeframe is briefly mentioned, but is rejected out of hand, with the unsupported conclusion that “any adjudication timeframe for [EADs] would unnecessarily constrict adjudication workflows.”<sup>14</sup> USCIS’s argument contradicts its own acknowledgment that, even before *Rosario*, USCIS adjudicated 92 percent of applications within 90 days<sup>15</sup> and 68 percent within 60 days.<sup>16</sup> The Supreme Court has held that an agency’s proposal is arbitrary and capricious if it fails to consider an important alternative “within the ambit of the existing [policy]”<sup>17</sup> or fails to give “adequate reasons” for rejecting an alternative approach.<sup>18</sup> Here, USCIS offers no reasoned analysis to support its decision to abandon a firm timeline altogether, rather than adjusting the timeline to one that would better fit with existing resources while still providing a basis for firm expectations. The agency’s conclusory reference to its inability “to plan its workload and staffing needs with the level of certainty that a binding timeframe may require”<sup>19</sup> is plainly insufficient, particularly against a background of 25 years of working *with* a binding timeframe. Moreover, the claim that USCIS cannot predictably meet this requirement ignores its own performance with respect to *Rosario*. According to its most recent filing with the court, USCIS adjudicators have completed 99% of all asylum EAD applications within 30 days.<sup>20</sup> By failing to adequately consider *any* deadline, USCIS shirks its responsibility for justifying its departure from existing policy under the APA.

## 2. USCIS Fails to Consider the Proposed Rule’s Full Costs.

USCIS’s cost-benefit analysis is limited to lost wages and lost tax revenue,<sup>21</sup> ignoring additional factors relevant to reliance upon the EAD. As discussed below, the economic impact of the Proposed Rule goes far beyond direct loss from foregone earned income. For many unaccompanied children, delays in issuing an EAD could result in delays in obtaining identity documents, basic state services, and deferral or denial of long-term opportunities.<sup>22</sup> A cursory analysis that omits a significant impact of a change in policy has been found in other instances to constitute arbitrary and capricious behavior.<sup>23</sup> By ignoring the role the EAD plays in securing access to state and local benefits, USCIS has failed to satisfy the APA’s requirements.

Moreover, USCIS claims that it would need to hire more officers and shift its resources to comply with the 30-Day Requirement. However, it does not evaluate *those* costs. USCIS flatly states that it “has not

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<sup>14</sup> Proposed Rule at 47,167.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.* at 47,162.

<sup>17</sup> See *Motor Veh. Mfrs. Ass’n of U.S. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 51 (1983).

<sup>18</sup> See *id.* at 48.

<sup>19</sup> *Proposed Rule*, *supra* note 1, at 47,167.

<sup>20</sup> Compliance Report, *Rosario* Litigation: USCIS I-765 –Application for Employment Authorization Eligibility, Category: CO8, Pending Asylum Initial Permission to Accept Employment Completions by Processing Time Buckets, FY15-FY19 (Through June 30, 2019), No. 15-cv-813 (W.D. Wa.), Dkt. #146.

<sup>21</sup> Proposed Rule at 47149–50.

<sup>22</sup> See *infra* Section II.

<sup>23</sup> See *State Farm*, 463 U.S. at 43 (agency actions that “entirely [fail] to consider an important aspect of the problem” are arbitrary and capricious).

estimated the costs of [hiring more officers] and therefore has not estimated the hiring costs that might be avoided if this proposed rule were adopted.”<sup>24</sup> But this is simply irrational and fails to satisfy the most basic cost-benefit obligations the agency must meet. This failure even to calculate the costs of continuing to administer EADs on a fixed schedule, coupled with the failure to take into account indirect and less tangible costs of the rule change, again fails to satisfy the government’s APA burden.<sup>25</sup>

## **II. The Proposed Rule Jeopardizes the Health and Well-being of Unaccompanied Minors Seeking Asylum**

Although DHS cites the growing asylum backlog as a justification for eliminating the mandatory 30-day completion requirement, the backlog is in fact a reason to adhere more stringently to that requirement. Based on the observations of KIND’s social services providers, the EAD provides a vital link between children and the network of services necessary to help them adjust to their new surroundings and to overcome the trauma they have experienced in their lives. In addition to delaying access to work itself, the proposed rule could undermine or limit access to state services, lead to greater financial instability, and exacerbate the social and psychological strain imposed by the asylum application process and discourage children’s participation in it.

### *A. The Proposed Rule Would Prevent Children from Receiving Identity Documents Necessary for Public Services.*

Not all unaccompanied children are eligible to work (by virtue of child labor laws), but all unaccompanied children’s welfare depends on their access to basic resources. The Proposed Rule, if finalized, would jeopardize that access. Unaccompanied children use EADs to verify their identity and confirm their lawful status.<sup>26</sup> In fact, EADs are often the only proof of lawful residence asylum-seekers can provide.<sup>27</sup> Unaccompanied children need EADs to receive Social Security Number (SSNs),<sup>28</sup> which are common prerequisites for accessing long-term educational opportunities, qualifying for vocational and technical programs, obtaining health insurance, and receiving preventative care.<sup>29</sup> For example, unaccompanied children in Georgia who do not have SSNs are ineligible for PeachCare, the state-wide

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<sup>24</sup> *Proposed Rule*, *supra* note 1, at 47,149.

<sup>25</sup> *See State Farm*, 463 U.S. at 43.

<sup>26</sup> *See* USCIS, *Form I-9 Acceptable Documents*, <https://www.uscis.gov/i-9-central/acceptable-documents/list-documents/form-i-9-acceptable-documents>.

<sup>27</sup> *See* Mass. Registry of Motor Vehicles, *Massachusetts Identification (ID) Requirements*, <https://www.mass.gov/guides/massachusetts-identification-id-requirements>.

<sup>28</sup> *See* U.S. Social Security Admin., *Applying for Your Social Security Number While Applying Your Work Permit*, [https://www.uscis.gov/sites/default/files/USCIS/Working%20in%20the%20US/EBE\\_Flyer\\_Apply\\_for\\_your\\_Social\\_Security\\_Number\\_While\\_Applying\\_for\\_Your.pdf](https://www.uscis.gov/sites/default/files/USCIS/Working%20in%20the%20US/EBE_Flyer_Apply_for_your_Social_Security_Number_While_Applying_for_Your.pdf).

<sup>29</sup> *See, e.g.,* Ga. Dep’t of Community Health, *Citizenship, Immigration and Identity Requirements*, <https://dch.georgia.gov/programs/peachcare-kids/eligibility-criteria/citizenship-immigration-and-identity-requirements> (requiring SSN for enrollment in Georgia PeachCare).

child healthcare program,<sup>30</sup> and the same is generally true for state identification documents and access to physical and mental health treatment nationwide. KIND's social service staff have observed that an SSN is a prerequisite for obtaining a driver's license in New York, opening a bank account as a teenager in Massachusetts, obtaining a driver's license or state ID in Texas, receiving an independent living stipend for long term foster care recipients in Washington state, and in dozens of other state programs in our areas of service.

The importance of ensuring access to healthcare cannot be overemphasized. The act of seeking asylum in itself can be both traumatic and psychologically taxing, over and above the traumas and injuries many child asylum seekers suffered in their countries of origin that prompted their travel here.<sup>31</sup> Children entering the country are unsure whether they will get to safely remain in the U.S. or be sent back to the violence, sexual abuse, persecution, or extreme poverty that they fled. The proposed rule would compound that uncertainty and worsen existing psychological damage by inhibiting access to treatment.<sup>32</sup> Instead of creating a sense of safety and security, prolonged delays in obtaining the EAD could easily contribute to a failure to address their uncertainty and insecurity, heightening the fears and anxieties that already plague many child asylum-seekers.<sup>33</sup>

*B. The Proposed Rule Would Limit Options for Unaccompanied Children in Need of Financial Support.*

EADs open the door to employment, providing work-eligible older unaccompanied children<sup>34</sup> with the financial support they need to access housing, food, clothing,<sup>35</sup> and legal support<sup>36</sup> while their asylum

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<sup>30</sup> *Id.*; GA. DEP'T OF HUM. SERVS., MEDICAID MANUAL, § 2215 (last revised Feb. 2019), *available at* <http://www.georgiamedicaidlaw.net/gamedicaid/2215.pdf>.

<sup>31</sup> Kiara Alvarez and Margarita Alegria, *Understanding and Addressing the Needs of Unaccompanied Immigrant Minors*, AM. PSYCHOLOGICAL ASS'N (June 2016), <https://www.apa.org/pi/families/resources/newsletter/2016/06/immigrant-minors>.

<sup>32</sup> Human Rights Watch, *At Least Let Them Work*, (Nov. 12, 2013) ("[Asylum seekers] who had survived egregious persecution in their home countries said that being barred from work made them feel that they were re-experiencing persecutory or discriminatory treatment."), *available at* <https://www.hrw.org/report/2013/11/12/least-let-them-work/denial-work-authorization-and-assistance-asylum-seekers-united>.

<sup>33</sup> *See, e.g. New Work Authorization Rule for Asylum Seekers Could Have Devastating Consequences*, *supra* note 29.

<sup>34</sup> Because of the length of I-589 adjudications, a substantial number of minors who seek asylum as unaccompanied children remain in the process while they reach adulthood and lose access to foster care and other forms of community financial support, leaving them as reliant on work as adult applicants.

<sup>35</sup> *See New Work Authorization Rule for Asylum Seekers Could Have Devastating Consequences*, HUMAN RIGHTS FIRST (Sept. 6, 2019), <https://www.humanrightsfirst.org/press-release/new-work-authorization-rule-asylum-seekers-could-have-devastating-consequences>.

<sup>36</sup> *At Least Let Them Work: The Denial of Work Authorization and Assistance for Asylum Seekers in the United States*, HUMAN RIGHTS WATCH (Nov. 12, 2019) <https://www.hrw.org/report/2013/11/12/least-let-them-work/denial-work-authorization-and-assistance-asylum-seekers-united> ("[B]ecause they cannot work, they cannot afford legal assistance, and because they cannot afford legal assistance, they often fail to represent their claims competently[.]")



cases are pending. By frustrating access to such support, the proposed rule could diminish children's ability to navigate the asylum process and obtain immigration relief.<sup>37</sup> KIND social service providers across the country note that work authorization offers children better and safer work opportunities, as well as the chance of accessing employer-supported health insurance and other benefits. The ability to contribute to their own self-sufficiency can in turn produce powerful psychological and social benefits that make it easier to sustain a prolonged asylum application process and ensure that children obtain the healing and treatment that they need to thrive after traumatic experiences.<sup>38</sup>

In other contexts, research on the impact of work authorization and legal status suggests significant long-term benefits for young people. For example, studies tracing the impact of Deferred Action for Childhood Arrivals (DACA) status on young people have found that the vast majority of DACA recipients achieve greater financial stability with work authorization, obtaining high school diplomas, driver's licenses, and well-paying jobs with employment benefits.<sup>39</sup> While the circumstances for asylum-seekers are different, the value of the DACA research indicates the degree to which work authorization can be transformative for young people. Until such time as asylum backlogs are reduced, measures such as eliminating the 30-day processing requirement would only serve to further delay the tangible gains that children can quickly obtain when given access to work and basic services.

### **III. The Proposed Rule Cannot Be Justified Until Its Interaction with Another Forthcoming EAD Regulation is Included in the Administrative Record.**

Evaluation of the government's arguments is essentially impossible in light of their apparent inconsistency with the anticipated "Broader EAD NPRM" called for by a 2019 presidential memorandum.<sup>40</sup> The Broader EAD NPRM could generally prohibit individuals who defensively claim asylum from applying for work authorization until their immigration claims are finally adjudicated. It would also drastically reduce the number of migrants eligible for work authorization.<sup>41</sup> USCIS only briefly notes that the Proposed Rule's impact could be overstated if, as directed by the President, the Broader EAD NPRM is implemented.<sup>42</sup> Despite contemplating such major changes, USCIS simultaneously argues that the agency needs flexibility to handle *increases* in EAD applications.<sup>43</sup> This would be simply false if, under the Broader EAD NPRM, most applicants became ineligible for EADs, so USCIS's positions are fundamentally inconsistent. USCIS must consider the two issues—EAD eligibility and processing

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<sup>37</sup> *Id.*

<sup>38</sup> See Michelle L. Burbage and Deborah Klein Walker, *A Call to Strengthen Mental Health Supports for Refugee Children and Youth*, NAT'L ACADEMY OF MED. (August 2018), <https://nam.edu/a-call-to-strengthen-mental-health-supports-for-refugee-children-and-youth>.

<sup>39</sup> Fwd.US, *Expanding Opportunity for Dreamers Builds Success*, (Jan. 18, 2019), <https://www.fwd.us/news/expanding-opportunities-for-dreamers/>.

<sup>40</sup> Presidential Memorandum on Additional Measures to Enhance Border Security and Restore Integrity to Our Immigration System (Apr. 29, 2019).

<sup>41</sup> Zolan Kanno-Youngs and Caitlin Dickerson, *Asylum-Seekers Face New Restraints Under Latest Trump Orders*, N.Y. Times (Apr. 29, 2019), <https://www.nytimes.com/2019/04/29/us/politics/trump-asylum.html>.

<sup>42</sup> *Proposed Rule* at 47,150.

<sup>43</sup> *Proposed Rule* at 47,149.

timelines—jointly to determine accurately the costs and impact of its future EAD regime. Since the Proposed Rule is predicated on a situation that the agency intends to obviate by other policy changes, its stated reasoning is irrational and fails to satisfy the APA.

## Conclusion

The proposed rule is a significant departure from a longstanding, regulatory commitment to quickly adjudicate EADs when an asylum applicant's case has been pending over 150 days. The proposed rule fails to address the fundamental balancing of institutional constraints against individual hardship that led to the promulgation of the 1994 Asylum Reforms, including the current EAD processing requirements. That this balancing of equities was re-affirmed in the *Rosario* litigation, and that USCIS has proven capable of meeting the requirement when forced to do so by the courts, suggests that the proposed rule is a reaction to the litigation, rather than a carefully reasoned assessment of why the current balancing of interests should or should not remain intact. The failure to do a full cost benefit analysis further indicates that the rule is in violation of the APA, as it lacks both sound reasoning or financial justifications that remove it from the realm of an arbitrary and capricious exercise of authority.

Moreover, the proposed rule could have a profound impact on unaccompanied children seeking asylum by indefinitely delaying their access to EADs, which frequently serve as vital forms of identification and enable critical access to services such as health insurance and mental health care. It could prevent children from quickly acquiring the financial and psychological benefits that derive from employment, access to services, and greater certainty about the future. Finally, the NPRM must be withdrawn pending consideration alongside the Broader EAD Regulation, which would fundamentally alter the factors in the agency's calculation of costs and institutional imperatives that it now claims to be driving the Proposed Rule.

For the above reasons, KIND urges DHS to withdraw the proposed rule. While the growing asylum backlog is of concern to all who believe in a fair, efficient, and timely process, the costs of that backlog should not be borne by applicants. Particularly in the case of unaccompanied children, needlessly delaying access to employment, identity documents, and access to state services has the potential to further undermine the precarious existence of asylum-seekers in the United States.

Sincerely,

A handwritten signature in blue ink, reading "Maria M. Odom". The signature is fluid and cursive, with the first name "Maria" being the most prominent part.

Maria M. Odom  
Vice President for Legal Services



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2196

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Asylum seekers need to work in order to be able to provide for themselves and their family while a decision in their case is reached.

They are legally pursuing asylum. The backlog in all types of cases being processed is ridiculous. It is only reasonable to allow them to work while they wait for their asylum case to be processed.

How can you deny people the ability to work yet at the same time call them a public burden?

Wake up.

Asylum seekers are eager to contribute. Most of the time the jobs they apply for are jobs that Americans think they are too good for, or simply are too lazy to take. Let asylum seekers work and provide for themselves as well as contribute to society.

AR003954

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2197

Comment Submitted by Gary Bond

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## Submitter Information

**Name:** Gary Bond

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## General Comment

Please allow more time for background checks on asylum seekers to keep our country safe - 30 days is not enough!

AR003955

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2198

Comment Submitted by Ruth Krider

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## Submitter Information

**Name:** Ruth Krider

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## General Comment

Hello

I am advocating to keep the 30 day asylum seekers employment authorization application the way it is. Asylum seekers should be able to work in order to bring income to their families and to contribute to the tax base as a whole. If a person wants to work, and us able to do so, why would blocks be in place? Ive read that currently, over 90% of applicants are able to be vetted in 30 days. If longer is needed, an alternative would be to allow employment applications sooner in the process, say in 120 days rather than 150. That would let the government have 60 days vs 30 to process the paperwork.

Please keep government accountable by keeping the current 30 day window, or open the window to 60 days for asylum seekers to apply for employment.

AR003956

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2199

Comment Submitted by Antoinette Tadolini

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## Submitter Information

**Name:** Antoinette Tadolini

**Address:**

10977 Snow Cloud Trail  
Littleton, CO, 80125

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## General Comment

As a pro bono attorney representing asylum seekers, I urge USCIS not to remove the 30 day period for EAD processing. Asylum seekers are eager to get to work to support their families and become contributing members of society. Working asylees pay taxes and need fewer tax-supported social services. The regulatory analysis acknowledges revenue losses to the government due to the proposed changes. If time to evaluate security risks is indeed the motivation for this regulation, I suggest the agency address it at the other end of the time frame by decreasing the time period before an asylum applicant can apply for an EAD. If an asylum applicant could apply for a work permit earlier than 150 days after their asylum application is submitted, the agency could undertake its security checks sooner. This would simply shift the perceived need for a certain time period earlier in the cycle. As I stated earlier everyone benefits when asylees are able to work.

Thank you for the opportunity to comment.

AR003957

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2200

Comment Submitted by Toby Picker

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## Submitter Information

**Name:** toby picker

**Address:**

3500 tangle brush drive

apt 9

the woodlands, TX, 77381

**Email:** tfrbedellg@mail.com

**Phone:** 281-364-1781

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## General Comment

clearly what trump is doing regarding try9ng to remove the 0n day requirement needs to be stopped.

AR003958

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2201

Comment Submitted by Chloe Walker

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## Submitter Information

**Name:** Chloe Walker

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## General Comment

I am an attorney and social worker who has worked with many asylum seekers over the years. It is from this lens that I write this comment because I have seen both the legal and social ramifications of asylum regulations including the one at issue here. Asylum seekers have left their homes with only what they can carry and often times even those possessions are lost or stolen on the journey or confiscated by the government when they arrive. Asylum is a protection that must be applied for on U.S. soil regardless of how the asylum seeker arrives. The process is governed not just by US law but international standards. Asylum seekers must be here while they wait for their claim to be processed and are not eligible for any government benefits. Depending on where in the US they are waiting, there may be extremely limited resources in the community to help with their basic needs- housing, food, health care. Often time religious communities are a strong support for asylum seekers. The authorization to work while they wait for their case to move forward is a lifeline to help them meet their basic needs while waiting. Additionally, it is in the community and the government's interest to ensure that asylum seekers can have their basic needs met so that they can effectively and efficiently participate in their court hearings or asylum interviews. I have former clients who have been waiting to hear back from asylum office or immigration court since 2016 or longer. An EAD is a lifeline. I can think of no government interest that might outweigh the benefits to the government, the asylum system, asylum seekers or the community of leaving this protection in place.

AR003959

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2202

Comment Submitted by Alvaro Gouzy

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## Submitter Information

**Name:** Alvaro Gouzy

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## General Comment

Need to build the wall to stop all Illegals!!!!

AR003960

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2203

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The proposed rule threatens immense harm to asylum seekers, their families, and the US through lost tax revenue and decreased national security. USCIS is currently able to process 99% of work authorizations within 30 days, and this rule would greatly decrease the number of work authorizations processed in that timeframe. As a result, many asylum seekers would be unable to earn an income legally, which would create a cascade of negative effects. They would be less able to provide for themselves and their families, be at greater risk of homelessness, lack access to food/medical care/health insurance/social services/other basic needs, be at greater risk of suffering from serious mental health illnesses such as depression, and their risk for subjection to human trafficking and/or exploitation would increase immensely. As someone who works with survivors of human trafficking, I can attest to the magnitude of impact that lack of work authorization has on immigrants in this country. Traffickers prey on vulnerable populations without legitimate alternatives to earn a living, and this criminal industry harms not only its victims, but our communities as a whole with its insidious reach. Opening up more doors to this criminal enterprise by purposefully increasing the vulnerability of our immigrant population is NOT American and is a shameful attempt to mislead the American people without effecting any beneficial change.

Further, USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. The new rule will also cause our country to lose hundreds of millions of dollars in tax revenue for the sole purpose of carrying out systemic efforts to harm immigrants. It will operate contrary to our national security interests by increasing the period of time in which asylum seekers remain in the US unprocessed and without work authorization over which the US has control.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCIS's goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be

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more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2204

Comment Submitted by Patricia Roth

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## Submitter Information

**Name:** Patricia Roth

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## General Comment

Please support our President in this matter. He has more common sense than most people.He also has the strength to do what must be done to save our country.

AR003963

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2205

Comment Submitted by Sandra Kwak

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## Submitter Information

**Name:** Sandra Kwak

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## General Comment

Protect asylum seekers!

"Give me your tired, your poor, Your huddled masses yearning to breathe free, The wretched refuse of your teeming shore. Send these, the homeless, tempest-tossed to me, I lift my lamp beside the golden door!" ~The Statue of Liberty

This country was founded by immigrants and unless you are Native American, you came from an immigrant.

Asylum seekers are coming from incredibly difficult places, escaping oppression and against all odds have made it here seeking freedom.

I personally know a family that sent their daughter to the US to protect her because there were was so much violence in their community. She was turned away at the border and the cartel kidnapped her and is demanding payment from her family but they do not have the money. Imagine if this was your daughter.

This is a dark day for America. What has become of our country? It is horrific that children are being separated from their families and DYING at the border, that our administration "lost" 100s of children who are probably now being trafficked. That these babies are experiencing sexual abuse and assault. What if this happened to your child? How can you sleep at night when this is going on?

Please do the right thing and protect asylum seekers.

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2206

Comment Submitted by Jessica Wallace

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## Submitter Information

**Name:** Jessica Wallace

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## General Comment

I am an immigration attorney in Miami, Florida. My clients include asylum seekers. I am writing regarding the importance of providing asylum seekers with timely work authorization.

A person who lacks documentation in this country is extremely vulnerable. Many asylum seekers do not have passports and would be unable to get a current photo idea from the government or country that they are fleeing. Furthermore, Asylum seekers, who have brought themselves to the attention of the government, and are going through the correct channel to remain legally in the U.S. should not be placed in this vulnerable position. When a person lacks documentation, they lack the ability in many states to get a drivers license. Clients who live in Tennessee, for example, are unable to get a drivers license or state ID without an employment authorization document. Similarly, in Florida, asylum seekers in Florida are unable to get a state ID until they get their employment authorization document. This makes doing the simplest things difficult. For example, many banks will not allow people to open accounts without a drivers license or state ID. Miami Dade County Public Schools, one of the biggest school districts in the nation, and other school districts around Florida now use the Raptor system, which conducts background checks of all individuals who enter schools. Parents without card readable IDs are denied entry to school grounds.

This means that asylum seekers will be prevented from coming to a parent teacher conference or attending school events until they obtain their work authorization and are able to obtain a photo identification. While asylum seekers are legally permitted to be in the United States, these individuals will be kept from doing other important activities. A person cannot get a hotel room without photo identification. It is difficult to rent an apartment without photo identification. A person can't get on an airplane without photo identification. A person cannot get married without photo identification. A person cannot pick up a prescription medicine without photo identification. Even certain over the counter cold medicines are unavailable without photo identification. Ultimately, an asylum seeker needs to have photo identification available immediately in order to carry out activities necessary to live a normal life in the United States.

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Many asylum seekers have already faced trauma, both in their home country, or in the process of flight or travel. Folks who have faced trauma have greater difficulty facing and finding workarounds for the above types of problems.

In addition to photo identification, authorization to work is vital to asylum seekers. People coming to this country escaping persecution are generally willing and able to work and support themselves in the United States, and if given the opportunity to do that, they will. By delaying work authorization, asylum seekers are between a rock and a hard place. They want to support themselves, but they are prohibited from working to do so. It is unclear how this government proposes that these folks survive. By delaying work authorization, the government pushes people who have no other source of income or resources to work without authorization, a nonsensical result.

I would suggest that rather than drop the requirement that USCIS process work authorizations in 30 days, instead, allow people to apply for work authorization as part of their initial asylum application (work authorization questions can be added to the asylum application, and make them one application rather than two, which will reduce immigration attorney fees as well). At the very least, the application (I-765 should be submitted at the same time as the asylum application). That would ensure that USCIS would have the time it needed to process the application, but would hopefully address the problem of documenting and providing work authorization more quickly to asylum seekers. Asylum seekers should have their work authorization much sooner so that they have the ability to support themselves, in addition to being able to carry out the other requirements of life, such as entering their childrens' schools, picking up prescription medicines, renting a hotel room, etc.

For these reasons, the proposed regulations should not be imposed, and instead, regulations based on the above considerations should be implemented.

AR003966

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2207

Comment Submitted by Tiffany Finley

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## Submitter Information

**Name:** Tiffany Finley

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## General Comment

Do NOT remove this provision. The immigration process is already so lengthy and without time bounds and accountability to execute.

AR003967

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2208

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Asylum seekers need to be able to get permission to work ASAP, so that they can get on their feet. It's completely senseless to delay their work permits. When they can't support themselves they become vulnerable to poverty and are more likely to become a burden rather than a boon to our economy. Allowing them to work quickly benefits them and our economy.

AR003968

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Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2209

Comment Submitted by Sal Piazza

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## Submitter Information

**Name:** Sal Piazza

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## General Comment

Let the President do his job!

AR003969



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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2210

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I work in Immigration law, and I have met actual people seeking asylum in the United States. They are coming here because they have fear or trauma from past experiences in their home country--so badly do they fear their past that they have to flee their country. I urge you to consider that for a minute: How tragic is that life? Extremely tragic. These people are coming to the United States to seek safety, security, and protection. But how safe are they if they aren't allowed to work and earn a living? Many of them have a spouse and children to feed, support, and shelter. Not to mention they have already been waiting for 5 months to apply for work authorization. There is no reasonable explanation why an officer of Immigration should take more than 30 days to adjudicate an application. I have seen the I-765 application first hand, and it is very few pages. Furthermore, keeping these people from working is not productive for society. If they work, they earn money, spend money, and help improve our economy--all while protecting their families. Please do NOT take away the 30 day decision deadline for the I-765 application.

AR003970

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-2710
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2211

Comment Submitted by Bill Johnson

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## Submitter Information

**Name:** Bill Johnson

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## General Comment

It's time to fully stop illegal immigration and to close all loopholes that allow people to game the system. It's my understanding that 1 out of 5 people in America have been born out of the United States, This must end, it must be reversed. We have a foreign influence, taking over America.

AR003971

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<b>Posted:</b> November 08, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2212

Comment Submitted by Don Cornejo

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## Submitter Information

**Name:** Don Cornejo

**Address:**

CA, 94707

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## General Comment

The proposed regulation goes in the wrong direction. Speed approvals for asylees to receive work authorization, dont delay such approval. Work builds relationships, language skills and cultural competencies among all involved, asylees and citizens alike. Speedier approval of work authorization, speeds assimilation. Thats most desirable for society, security and productivity.

AR003972

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-6yv7
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2213

Comment Submitted by Alexandra Caudill

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## Submitter Information

**Name:** Alexandra Caudill

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## General Comment

I work at a refugee resettlement agency and often encounter asylum-seekers and individuals who have recently received asylum. Out of all of these individuals I have met or worked with, EVERY single one wants to become work authorized so that they can become financially self-sufficient to support themselves and their families. Eliminating this rule will not only harm asylum-seekers and their families, but also place strain on the organizations and systems that work with immigrants/low-income individuals as well as lead to a loss of tax dollars. Eliminating the 30-day EAD processing rule will not only lead to serious harm for these individuals and their families (most of whom have not left their country of origin by choice, but because they have no choice) but also harm American communities and systems generally.

AR003973

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2214

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I volunteer as a translator for asylum seekers prior to their Critical Fear Interviews. Their stories are horrific - abuse, death threats, beatings, imprisonment by gangs, forced labor, threats to their children. They have suffered horribly before they reach US soil, and only want to live a peaceful and safe life. Quickly granting them permission to work gets them on their way to that goal, and helps them realize that America is a welcoming place that lives up to its ideals. Each person I talked to wants to work, wants to integrate into a life here, and wants to be a part of this country. Please, help them get started on that path. Let them get to work as soon as they arrive!

AR003974

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2215

Comment Submitted by Carol Burks

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## Submitter Information

**Name:** Carol Burks

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## General Comment

This is another of the left's way to deter president Trumps decision. This is insane Stop This Now.

AR003975

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6t-2835
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2216

Comment Submitted by Richard Jagel

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## Submitter Information

**Name:** Richard Jagel

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## General Comment

Cut Mr Trump a break and allow time to vet the people!!!!!!!!!!!!!!!!!!!!!!

AR003976

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
<b>Received:</b> November 07, 2019
<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6s-xijf
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2217

Comment Submitted by Susan Fix

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## Submitter Information

**Name:** Susan Fix

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## General Comment

I live in Oregon and have been working with a group that helps legal asylum seekers and refugees. It is to the advantage of all of us that people who are here legally be allowed to work and contribute to our country while they are waiting for their case to be heard. They help our economy by working and, of course help themselves and their families when they are productive members of our community. I strongly support shortening the time before asylum seekers are granted authorization to work.

AR003977



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<b>Status:</b> Posted
<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2218

Comment Submitted by Peter Rodman

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## Submitter Information

**Name:** Peter Rodman

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## General Comment

Asylum seekers should be able to work pending the adjudication of their claims. There are delays at the asylum office and in court of years which causes unnecessary uncertainty and stress to the applicants. The wait times have increased under this administration. It helps our economy to allow them to stimulate it and to provide for their families. Without a valid work authorization, they will be unable to work. Currently there are categories of work authorization that are taking over eight months to obtain and renew. These delays lead to loss of jobs which is bad for the employee, employer, employees family and the entire US. Please do not let this happen to innocent asylum seekers.

AR003978

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<b>Posted:</b> November 08, 2019
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2219

Comment Submitted by Leah Price

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## Submitter Information

**Name:** Leah Price

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## General Comment

This doesnt make any sense to remove this rule. Immigrant families need to work to support themselves so initial employment authorization documents should be granted as quickly and efficiently as possible.

AR003979

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2220

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Delays in asylum seekers getting their work authorization (Employment Authorization Document or "EAD") approval could lead to homelessness for those asylum seekers and their families. I live in California where homelessness has reached crisis proportions. According to the Wall Street Journal Californias homeless population is going up despite billions of dollars in taxpayer-funded efforts...[there are] 58,936 homeless people in Los Angeles County, which includes 36,300 in the city. The county has the nations largest outdoor-homeless population.[1]

According to analysis coming from [www.whitehouse.com](http://www.whitehouse.com) homelessness is a serious problem. Over half a million people go homeless on a single night in the United States. Approximately 65 percent are found in homeless shelters, and the other 35 percent just under 200,000 are found unsheltered on our streets (in places not intended for human habitation, such as sidewalks, parks, cars, or abandoned buildings). Homelessness almost always involves people facing desperate situations and extreme hardship [2]

It is counter-productive to add to the current homelessness problem in the United States

[1] <https://www.wsj.com/articles/homelessness-grows-in-california-despite-new-government-spending-11559899801>

[2] <https://www.whitehouse.gov/wp-content/uploads/2019/09/The-State-of-Homelessness-in-America.pdf>

AR003980

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2221

Comment Submitted by Nathalie Karpati

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## Submitter Information

**Name:** Nathalie Karpati

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## General Comment

Let asylum seekers work! They are held in removal proceedings for over 4years sometimes, and there is no sense in not allowing them to pursue their own well-being during such time. Not to mention that doing away with the 30-day regulation would cost uscis millions in processing costs. This proposed change has no sense other than blatantly attacking the most vulnerable sector of society.

AR003981

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2222

Comment Submitted by Vanessa Frank

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## Submitter Information

**Name:** Vanessa Frank

**Address:**

PO Box 877

Ventura, 93002

**Email:** [vanessa@vanessafranklaw.com](mailto:vanessa@vanessafranklaw.com)

**Phone:** 8056419300

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## General Comment

This proposed rule change should not be implemented. In addition to serving as a further burden on those most vulnerable, pushing them into shadow economies and other dependencies, I want to comment that a lack of an EAD as of January 2020 will prevent asylum-seekers from being able to travel within the USA. Due to REAL ID Act requirements, without an EAD, asylum-seekers will be prevented from moving easily within the USA while they wait indefinite time for their EAD. This has the natural consequence of further reducing their ability to settle and integrate into life in the USA and can prevent people from reuniting with family, seeking better work or life opportunities, and other deleterious effects.

AR003982

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2223

Comment Submitted by Cynthia Hogan

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## Submitter Information

**Name:** Cynthia Hogan

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## General Comment

STOP THE MADNESS!! You are more lenient and giving with illegals coming into our country than with the people that pay your salaries! Free healthcare? Free college? What about our Vets? Stop protecting other nations borders and protect our own!

AR003983

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<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2224

Comment Submitted by S Shepherd

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## Submitter Information

**Name:** S Shepherd

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## General Comment

Eliminating the 30 day processing provision for asylum seekers to obtain work authorization will hurt asylum seekers, their families, the economy, and tax revenue. It will also increase, not decrease national security risks. Asylum seekers rely on employment authorization to be able to work legally and earn money to support themselves and their families instead of relying on public assistance. Their legal wages are also subject to taxation, meaning millions of additional dollars of tax revenue is generated by their work. Further, USCIS has already demonstrated that it can adequately vet asylum seekers by running background checks within the 30 day period. However, if USCIS feels more time would be beneficial, it can always shorten the wait time before asylum seekers can submit their applications, thus giving the agency more time to run the background checks. Please remember that seeking asylum is not a crime. It is a legal right not a loophole. While awaiting lengthy adjudication time-frames, asylum seekers should have the ability to legally work, pay taxes, and support themselves.

AR003984

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2225

Comment Submitted by Russell Nelson

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## Submitter Information

**Name:** Russell Nelson

**Address:** United States,

**Email:** russnelson@gmail.com

**Phone:** 3156008815

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## General Comment

We should have open borders. No restrictions on who may enter the US and work. The only tolerable restriction should be to keep sick people away.

We shouldn't remove the 30 day processing provision. We shouldn't have restrictions on asylum seekers in the first place. If they want to come here and work, LET THEM.

AR003985



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2226

Comment Submitted by Gary Tolman

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## Submitter Information

**Name:** Gary tolman

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## General Comment

Tell theses illegal aliens to either become us citizens or go back to there countries and quit living on my money and free health care

AR003986

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2227

Comment Submitted by Brenda Paoni

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## Submitter Information

**Name:** Brenda Paoni

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## General Comment

Please remove the time line so president Trump can get the job done correctly. There isnt a good reason for the time line.

AR003987

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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2228

Comment Submitted by Rebecca Eissenova, Catholic Social Services of Fall River

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## Submitter Information

**Name:** REBECCA EISSENOVA

**Address:**

1600 Bay St.

Fall River, MA, 02724

**Email:** reissenova@cssdioc.org

**Phone:** 508-674-4681

**Fax:** 508-675-2224

**Organization:** Catholic Social Services of Fall River, Inc.

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## General Comment

I am an immigration attorney for Catholic Social Services of Fall River, an affiliate of the national Catholic Legal Immigration Network, Inc. This proposed rule does not advance the interests of the United States or our citizens and it should be discarded.

Both our own American laws and international obligations require this country to provide asylum seekers a full and fair opportunity to have their cases heard and considered. As such an opportunity cannot be granted overnight, asylum seekers frequently wait a year or more for their cases to be decided. In the meantime, they are legally allowed in the U.S. and cannot be deported to the country they fear.

It is in the interest of the United States to ensure that such legally-present people have a means of supporting themselves while they wait to vindicate their rights.

This is the reason that employment authorization is granted to asylum seekers after their applications have been pending for 180 days. The longer people go without a means to support themselves, the more dire their own situations grow. The more desperate they become, the more negative consequences are wreaked on other American members of their community and our society more generally.

Notably, work permits are not merely a means to demonstrate employment eligibility. Most states also require them in order for a person to apply for a driver license. Because asylum seekers cannot obtain passports from their countries of origin without risking their cases, work permits may be the only government photo-ID to which

AR003988

they have access. Without a work permit, then, asylum seekers not only lack access to financial self-sufficiency, but they also lack independence of mobility and access to things such as certain prescriptions, banking resources, and many other daily services that require government identification.

By ceasing to grant prompt work authorization to asylum seekers under the current rule, DHS would create a desolate underclass of thousands and thousands of people who fled to this country with only the shirts on their backs and who now must remain in this country with no money to buy themselves food, shelter, or healthcare. The impact on American citizens is obvious: the strain of social services agencies like mine, a rise in homeless populations, expensive emergency medical treatment on the taxpayers' dime, a rise in unwillingly uninsured drivers, and a rise in unlawful employment practices by employers seeking to exploit vulnerable people they can pay less than lawful American workers.

The negative effects of creating an underclass of needy individuals who cannot legally support themselves is amplified in times like this, when asylum applications are on the rise. Harm is only more likely at the time of this rule change proposal than in the past -- to both Americans and innocent asylum seekers who have already endured terrible tragedies.

Although this rule deals with the required adjudication time for work permits, rather than the issuance of work permits for asylum seekers at all, its potential for harm is not much diminished. USCIS is an exceedingly busy agency and processing times for many application types have more than doubled in the past two years. The 30-day requirement appropriately prioritizes employment authorization for asylum seekers, who are among the most vulnerable immigrants, with the least amount of family or other external resources in this country. Other work permit categories get processed in an average of 4-6 months after filing, but there are some categories that take as long as 19 months right now. When added to the 150-day filing wait already in place for asylum seekers, these averages suggest asylum seekers would be left isolated and financially destitute for at least 9-11 months, possibly over two years. Indeed, without any regulatory deadline to serve even as an aspiration for case completion, there are no assurances of even that.

If the agency has encountered difficulties adjudicating EAD applications within the 30-day (or 90-day) timeframe, there are solutions that are far, far less costly to the public and society than eliminating the timeframe. Principal among them is that the agency could simply hire more adjudicators. Fees for other forms could be increased to accommodate this relatively small cost -- and with the recent elimination of an entire category of eligibility for fee waivers, it seems likely that fee increases would not even be necessary to increase revenue.

In short, there is no justification for removing this prioritization that could outweigh the harm it would do on immigrants, Americans, and our communities. This rule change would be poor policy, and it should not be adopted.

AR003989

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2229

Comment Submitted by Elizabeth Farmer

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## Submitter Information

**Name:** Elizabeth Farmer

**Address:**

7150 45th Ave SW  
Seattle, WA, 98136

**Email:** bethfarmerlicsw@gmail.com

**Phone:** 2066834512

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## General Comment

The asylum process is incredibly long. Asylum seekers sometimes wait for years for their cases to be heard. During that time they cannot access federal benefits and most (if any) state benefits. They must work to have food to eat, a roof over their head, and to pay for essential care. Without the ability to work they are incredibly vulnerable to exploitation and trafficking.

AR003990

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2230

Comment Submitted by Lynn Marcus

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## Submitter Information

**Name:** Lynn Marcus

**Address:**

4270 N. Rillito Creek Place

Tucson, AZ, 85719-1162

**Email:** lynnandpeter@comcast.net

**Phone:** 5208505493

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## General Comment

The proposed rule change is wrongheaded and inhumane. Based on 30 years of experience assisting and representing asylum seekers, I know that many individuals do not have relatives with the means to support while they await the adjudication of their claims. Congress enacted asylum laws as a humanitarian measure in order to bring the U.S. into compliance with the UN Protocol on the Status of Refugees of 1967, which drew on the experience of World War II and the Holocaust and sought to create rules and norms for protecting refugees throughout the world. Ensuring an asylum seeker's ability to earn money for food, shelter, and other basic needs is a critical step in the process of protecting those seeking to establish their claims as "refugees." Six months from the application date is already a substantial waiting time, especially when one considers that before that clock begins, applicants will often need to secure the assistance of counsel and will typically need to gather corroborating evidence and prepare personal statements, all of which takes time as well as resources.

Religious communities in this country are doing their part but their resources are stretched thin and it is unfair and unrealistic to expect them to support asylum seekers for extended periods of time. Asylum seekers who are not in school should be encouraged to work to support themselves if they are able and the government should adjudicate their work authorization applications promptly. To comply with the spirit of the UN Refugee Convention and the Refugee Act of 1980, and to safeguard the human rights and basic needs of asylum seekers, the government should keep the 30-day processing provision in place.

AR003991

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2231

Comment Submitted by Katrina Rother

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## Submitter Information

**Name:** Katrina Rother

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## General Comment

I am writing in support of President Trump's immigration reforms. This issue is critical to our Country and requires us, as a nation, not only to enforce the immigration laws we currently have, but to further refine immigration to our Country to protect our citizens.

AR003992

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<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2232

Comment Submitted by Diane Ketchner

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## Submitter Information

**Name:** Diane Ketchner

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## General Comment

Please Support President Trump's Immigration Reform and quit cutting corners on immigration! Keep America Safe!!!  
Thank you.

AR003993



# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2233

Comment Submitted by Grace Kennedy

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## Submitter Information

**Name:** Grace Kennedy

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## General Comment

Let asylum seekers work, contribute to society and pay taxes. Americans do not benefit by having able bodied adults not permitted to work.

AR003994

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 08, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6y-cmxu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2234

Comment Submitted by Jan Brown

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## Submitter Information

**Name:** Jan Brown

**Address:**

363 Seventh Av

20th floor

New York, NY, 10001

**Email:** Jhb@janhbrown.com

**Phone:** 212 397-2800

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## General Comment

As an attorney, I have met many persons who have fled from wars and political dangers in their home countries. Often these are middle class, professional people whose lives have been ripped asunder. These people have skills that benefit the US and make them contributing members of their new society. However, without the prompt permission to work to which they are currently entitled, our nation suffers.

AR003995

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2235

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Hello,

I continually interact with a mother who is an asylum seeker and has two children one who is 1 and one who is 3. The mother received permission to work quickly which allowed to feed and take care of her family just barely. Without permission to work I am certain she would be homeless or taking advantage of the goodness of stranger and friends to survive. There currently is a homeless crisis and it is a fact that if you cant work you either have to take advantage of social services or be homeless or both. I assume it is better for our nation to have people who are productive contributing citizens. Pls maintain the 30 day deadline. Thank you!

Peace,

Denise Woods

AR003996

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2236

Comment Submitted by Janet Turnidge

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## Submitter Information

**Name:** Janet Turnidge

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## General Comment

I strongly urge you to respect the Constitution of the United States of America. Do not violate our citizens rights. Immigrants are welcome, but only after going through the proper protocol.

AR003997

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2237

Comment Submitted by Carolyn Walters

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## Submitter Information

**Name:** Carolyn Walters

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## General Comment

Start helping the Pres. to get the job done right, where it will benefit everyone for the good. and for Congress to get back to working, instead of killing time doing nothing/

AR003998

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<b>Tracking No.</b> 1k3-9d6t-ftj2
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2238

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I write to express concern regarding the limits to work for asylum seekers. This proposal, along with so many other statements that have been floated on the news and Twitter, serve to reinforce the desire of the current administration to limit the success of any non-citizens. We are historically a country that helps the tired, weary and poor. Let us continue our mission.

AR003999

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6t-ijz7
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2239

Comment Submitted by Lauren Schrader

---

## Submitter Information

**Name:** Lauren Schrader

**Address:**

1601 Hennepin Ave Suite 200  
Minneapolis, MN, 55403

**Email:** Lauren@robichauaw.com

**Phone:** 6122497047

---

## General Comment

As an immigration attorney, I can speak firsthand at how the 30-day deadline helps my clients. Given the mere minutes it takes for a USCIS Officer to adjudicate a Form I765 (see USCIS time frames posted publicly), it is only reasonable they have to decide the case within 30 days. There are already severe immigration consequences for filing frivolous asylum claims, on top of the extremely heavy burden asylum seekers have to meet and the 150-day deadline they have to wait to apply for a work permit, so this rule doesnt let in any more immigrants than otherwise would come. More importantly, this rule promotes participation in the American workforce, encouraging those who enjoy our country to also actively participate in making it the best it can be. Forcing immigrants to sit at home while their asylum application is pending (at this rate, taking years), only burdens our economy more.

AR004000

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2240

Comment Submitted by Bill Segesser

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## Submitter Information

**Name:** Bill Segesser

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## General Comment

The United States was created and built by many seeking asylum. The inscription on the Statue of Liberty speaks to this. Over time, the US has become an emblem for freedom. It is not in our best interest to turn away from that now.

Allowing asylum seekers to work pending their hearing enables them to eat, find housing or shelter and not hide in the shadows. If the issue is processing time, then it is incumbent upon us to become more efficient. To erase the processing time likely puts more asylum seekers in a precarious position, and possibly more vulnerable in matters of personal safety and survival.

I urge the government to not remove the 30 day processing provision. We need to remember who we are.

AR004001



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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6s-67gv
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2241

Comment Submitted by Loretta Swartz

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## Submitter Information

**Name:** Loretta Swartz

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## General Comment

Please act to eliminate the restrictions and timeline being imposed to curtail adequate background checks on asylum seekers. Without adequate time and thorough checks, American's safety is jeopardized if such is not done. It has happened before with dire consequences. Please don't let it happen again.

AR004002

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2242

Comment Submitted by Leah Engle

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## Submitter Information

**Name:** Leah Engle

**Address:**

332 Duke Road, apt. 1

Lexington, KY, 40502

**Email:** Leahengle@gmail.com

**Phone:** 8109191985

---

## General Comment

I am opposed to eliminating the 30 day processing provision for asylum EAD applications. Speedy adjudication is crucial for asylum seekers to gain stability and be able to prove authorization to work. Removing the provision will lead to long delays, cost the United States tax revenue, and prevent people from finding employment and becoming self-sufficient.

AR004003

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<b>Posted:</b> November 08, 2019
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2243

Comment Submitted by Rita Dingus

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## Submitter Information

**Name:** Rita Dingus

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## General Comment

Please support President Trumps Immigration Reforms. It's becoming more obvious every day that voting people in USA are being ignored and put behind people from other countries who want to enter the USA illegally and it seems elected officials are okay with that. We, the people, are not okay with any of it. Do the job you were elected to do! It's about time!

AR004004

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d73-bq9i
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2244

Comment Submitted by Susan Hahn

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## Submitter Information

**Name:** Susan Hahn

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## General Comment

Whatever time frame is necessary - the background of EVERYONE entering the United States needs to be thoroughly checked!

This processed must not be rushed!

AR004005

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2245

Comment Submitted by Sharon Stanley-Rea

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## Submitter Information

**Name:** Sharon Stanley-Rea

**Address:**

3040 Thayer Street NE

Washington, 20018

**Email:** sstanley@dhm.disciples.org

**Phone:** 2029577826

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## General Comment

I write as a clergy person with the Christian Church (Disciples of Christ), and also as one who has worked with immigrant and refugee communities for nearly three decades. The 30-Day Processing Provision for Asylum Applicants, related to EADs, has been in place for more than 25 years, and should be retained. Again and again, I have seen persons seeking asylum from horrific conditions of torture and violence, become productive and contributing residents in our U.S. society. EAD enables immigrants to contribute quickly and significantly to engage in meaningful employment, meet their family's physical needs for food, and maintain stable housing for their families. With this stability, children in families have been protected against homelessness, and have been much more able to remain in education consistently. Removal of this EAD provision for approval would be a step in a dangerous direction; diminishing the opportunities for immigrants to become most quickly self-sufficient, and would further traumatize individuals and families. Further, to care for the most vulnerable, including persons seeking protections through asylum, is our Biblical and faith calling.

AR004006

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2246

Comment Submitted by Karla Davis

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## Submitter Information

**Name:** Karla Davis

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## General Comment

Delays in processing asylum seekers' EAD forms have severe economical and constitutional impacts on the all of the U.S. population, both citizens and noncitizens. It presents a due process issue, as asylum seekers are already highly discriminated against and this is yet another instance of unnecessarily depriving this specific population from receiving access to timely determinations and adjudication on their cases. This regulation would give USCIS no accountability and presents an even higher unbalance of power than already exists. Currently, asylum seekers are at the mercy of DHS and any rule removing a timeframe for EAD processing is unreasonably detrimental to asylum seekers' livelihoods; it presents a serious human rights concern. Asylum seekers and other USCIS applicants should be given the basic minimum of protection from institutional oppression, as DHS continues to be at the helm of such violent tendencies. This is the time to do and be better.

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## Attachments

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AR004007





## Due Process

### Introduction

The Constitution states only one command twice. The [Fifth Amendment](#) says to the federal government that no one shall be "deprived of life, liberty or property without due process of law." The [Fourteenth Amendment](#), ratified in 1868, uses the same eleven words, called the Due Process Clause, to describe a legal obligation of all states. These words have as their central promise an assurance that all levels of American government must operate within the law ("legality") and provide fair procedures. Most of this essay concerns that promise. We should briefly note, however, three other uses that these words have had in American constitutional law.

### [Incorporation](#)

The Fifth Amendment's reference to "due process" is only one of many promises of protection the [Bill of Rights](#) gives citizens against the federal government. Originally these promises had no application at all against the states (see [Barron v City of Baltimore](#) (1833)). However, this attitude faded in [Chicago, Burlington & Quincy Railroad Company v. City of Chicago \(1897\)](#), when the court incorporated the Fifth Amendment's Takings Clause. In the middle of the Twentieth Century, a series of Supreme Court decisions found that the Due Process Clause "incorporated" most of the important elements of the Bill of Rights and made them applicable to the states. If a Bill of Rights guarantee is "incorporated" in the "due process" requirement of the Fourteenth Amendment, state and federal obligations are exactly the same.

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2247

Comment Submitted by Courtney Tudi, World Relief

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## Submitter Information

**Name:** Courtney Tudi

**Address:**

7 E Baltimore St  
Baltimore, 21202

**Email:** ctudi@wr.org

**Phone:** (720) 549-4844

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## General Comment

Re: Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications (DHS Docket No. USCIS-2018-0001)

Dear Ms. Deshommes,

I am writing on behalf of World Relief in opposition to the removal of the regulatory provision that requires USCIS to adjudicate an asylum applicants Initial Form I-765 Application for Employment Authorization within 30-days, Removal of 30-Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications (DHS Docket No. USCIS-2018-0001) published in the Federal Register by the Department of Homeland Security (DHS) on September 9, 2019. World Relief appreciates the opportunity to participate and to submit comments and we are filing these comments by the deadline of November 8, 2019.

Asylum applicants are a vulnerable population. They are fleeing persecution and looking to establish safety and security in the United States. The ability to work and provide for themselves and their families is a major step in establishing that safety and security. Removing the 30-day initial EAD processing regulation unnecessarily extends an asylum seekers instability at a time when the administration is pushing for immigrants to demonstrate that they are self-sufficient.

Please see our attached letter with our full comments. World Relief is requesting the Department of Homeland Security retain the 30-day processing of asylum seekers initial employment authorization document or in the alternative allow for asylum applicants to file form I-765 prior to the 150 day eligibility in order to allow DHS to

AR004009



have adequate time for processing and security checks, and not continue to delay the essential relief and stability asylum seekers need to recover from persecution.

Respectfully Submitted,  
Courtney Tudi

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## **Attachments**

Asylum EAD Comments 11-8-2019 CT edits

AR004010



7 E. Baltimore Street  
Baltimore, MD 21202  
T 443.451.1900 | F 443.451.1955  
worldrelief.org

November 8, 2019

Samantha Deshommes  
Chief, Regulatory Coordination Division, Office of Policy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, DC 20529-2140

Submitted via portal: <http://www.regulations.gov>

**Re: Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications (DHS Docket No. USCIS-2018-0001)**

Dear Ms. Deshommes,

I am writing on behalf of World Relief in opposition to the removal of the regulatory provision that requires USCIS to adjudicate an asylum applicant's Initial Form I-765 Application for Employment Authorization within 30-days, *Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications* (DHS Docket No. USCIS-2018-0001) published in the Federal Register by the Department of Homeland Security (DHS) on September 9, 2019. World Relief appreciates the opportunity to participate and to submit comments and we are filing these comments by the deadline of November 8, 2019.

World Relief is a global Christian nonprofit organization founded by the National Association of Evangelicals (NAE) in 1944 to assist victims of World War II. The mission of World Relief is to empower the local church to serve the most vulnerable to overcome violence, poverty and injustice. Through love in action, it brings hope, healing and restoration to millions of the world's most vulnerable women, men and children through vital and sustainable programs in disaster response, health and child development, economic development and peacebuilding. Since 1979, World Relief has resettled roughly 300,000 refugees and currently offers programs to encourage family integration to refugees, asylees, victims of human trafficking, and other immigrants in the United States. World Relief provides immigration legal services through attorneys and Department of Justice accredited representatives in numerous states in the U.S. World Relief currently has 17 active recognized and accredited sites and is offering technical legal support to 40 church-based programs who are either currently recognized and accredited or in the application process.

The ability to work while an asylum application is pending is vital to the stability and well-being of asylum seekers, who are desirous to establish safety and security in their lives after fleeing persecution. Asylum seekers already have to wait six months to be eligible to receive their initial employment authorization document and now USCIS wishes to have them wait longer. This is a burden and hardship on asylum seekers as the ability to work is essential.

AR004011

USCIS is presently under a court order to comply with the regulation it is trying now to eliminate. The Federal Court in *Rosario v USCIS* found USCIS to be in violation of 8 C.F.R. §208.7(a)(1) and enjoined USCIS from further failing to adhere to the 30-day deadline for initial asylum applicant EADs. This case is currently pending appeal before the 9<sup>th</sup> Circuit, yet DHS is now trying to do an end around a Federal Court decision rather than adhering to a lawful court order and awaiting the decision that is pending appeal. Moreover, USCIS entered into an agreed implementation plan with the plaintiffs in *Rosario v. USCIS* under which it will allocate resources to comply with the court order. USCIS wants to now violate and invalidate this agreement, essentially a contract, by eliminating the regulatory requirement it is implementing.

DHS states in its notice of proposed rulemaking that USCIS “has not estimated the costs” of implementing this rule on a long-term basis by hiring additional officers and “has not estimated the costs impacts that hiring additional officers could have on the agency’s form fees.” The elimination of this rule will however have real economic impacts on asylum applicants, employers and Federal, State and Local governments in terms of lost tax revenue.

The costs of eliminating this regulation would be borne by asylum seekers, employers and in lost tax income. Asylum seekers would directly impact from lost wages and an inability to be self-sufficient. USCIS estimates that lost compensation to asylum applicants could range from “\$255.88 million to \$774.76 million annually.” These lost wages would then result in lost employment taxes to the federal government, which could range from “\$39.15 million to \$118.54 million. The elimination of this rule will have real economic impacts on asylum applicants, employers and Federal, State and Local governments in terms of lost tax revenue. There can also be employment tax revenue losses to states and localities. Along with employment tax losses will be lost income through Social Security and Medicare contributions. The USCIS also acknowledges “a portion of the impacts of this rule would also be borne by companies that would have hired the asylum applicants.” “These companies would incur a cost, as they would lose productivity and potential profits the asylum applicant would have provided had the asylum applicant been in the labor force earlier.”

There are substantial financial costs from this rule that not only impact the asylum applicant, but the greater U.S. economy and tax revenue systems. USCIS did not perform due diligence to figure out what its costs would be if they had to continue to implement this rule long term. The greater societal losses should obligate USCIS to at a minimum evaluate the practical costs to the agency of continuing to comply with a court ordered injunction before simply eliminating the rule to avoid accountability to the court and passing along the costs to the greater American community and economy. Eliminating the 30-day rule is serving only the interests of USCIS to the detriment of society at large.

USCIS believes that without the regulation requiring the 30-day adjudication of initial asylum applicant EADs the “baseline processing” of these applications would return to what they were prior to the injunction ordered in *Rosario v USCIS*. This is a false construct. The complaint initiating the *Rosario* class action lawsuit was filed in 2015 in response to significant delays in processing. The processing within 30 days numbers then began to increase, only after the lawsuit was filed. They then increased substantially after the injunction was issued. The increase from 2015 to 2017 reflects the pending litigation and therefore using the FY 2017 processing numbers is inaccurate as the numbers increased after the *Rosario* complaint was filed.

According to documents filed by USCIS reporting on the processing of initial I-765 applications to the *Rosario* court, for fiscal year 2015 27.2% of initial I-765 filings were completed within 30 days, 74.3% within 60 days. In the two years following the *Rosario* complaint filing, 36.3% of initial I-765 applications were completed within 30 days in FY 2016 and 52.4 % in FY 2017. The numbers bear out that the increases in processing came after litigation started. Using FY 2017 as an accurate baseline for where application processing would be without the 30-day processing requirement is an inaccurate baseline. It is more accurate to look to the numbers for initial I-765 processing from before the *Rosario* class action was filed. Those numbers show that a paltry 27.2% of initial filings were completed within 30 days. Asylum applicants could reasonably expect USCIS processing to return to those levels if USCIS is allowed to ignore the court injunction and simply erase the 30-day processing regulation from the books.

The six-month wait arose out of concerns from fraudulent asylum filings. Now DHS is stating that six months is still not sufficient and removing the 30-day adjudication requirement and requiring asylum applicants to wait longer for initial applications will reduce opportunities for fraud. DHS claims that the 30-day processing time is outdated and no longer reflects current operational realities. However, DHS goes on to describe how “considerable efforts” were made to upgrade application procedures and to “leverage technology in order to enhance integrity, security and efficiency in all aspects of the Immigration process.” While the 30-day rule may be 20 years old, enhancements in technology that were not available 20 years ago can allow USCIS to continue to meet this requirement. As DHS states in its NPRM that applicants are now required to file at a USCIS lock box which is “used to accelerate the processing of applications by electronically capturing data and receiving and depositing fees.” DHS states it is already using technological advances to accelerate the processing yet continues to argue that it needs more time for processing. The acceleration through technology should reduce the amount of time needed for processing, not increase it.

An asylum applicant is already waiting 180 days in order to be eligible to receive an employment authorization document, yet DHS is stating that it needs more time to have “sufficient time to address national security and fraud concerns.” Instead of simply removing the 30-day adjudication requirement, allowing initial employment authorizations to be adjudicated well after six months, DHS should be using the already imposed six-month waiting period to complete any required security and fraud checks on an asylum applicant. Allowing an asylum applicant to file form I-765 prior to 150 days after asylum application filing would allow USCIS to complete their security and fraud checks, and still meet the needs of asylum applicants in being able to be self-sufficient while their asylum cases are pending.

Asylum applicants are a vulnerable population. They are fleeing persecution and looking to establish safety and security in the United States. The ability to work and provide for themselves and their families is a major step in establishing that safety and security. Removing the 30-day initial EAD processing regulation unnecessarily extends an asylum seeker’s instability at a time when the administration is pushing for immigrants to demonstrate that they are self-sufficient.

World Relief therefore requests the Department of Homeland Security retain the 30-day processing of asylum seekers’ initial employment authorization document or in the alternative allow for asylum applicants to file form I-765 prior to the 150 day eligibility in order to allow DHS to have adequate time for processing and security checks, and not continue to delay the essential relief and stability asylum seekers need to recover from persecution.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Courtney Tudi', with a stylized flourish at the end.

Courtney Tudi  
Director,  
National Immigration Programs  
P: (720) 549-4844  
E: [ctudi@wr.org](mailto:ctudi@wr.org)

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020 <b>Received:</b> November 07, 2019 <b>Status:</b> Posted <b>Posted:</b> November 08, 2019 <b>Tracking No.</b> 1k3-9d6s-xhcu <b>Comments Due:</b> November 08, 2019 <b>Submission Type:</b> Web
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2248

Comment Submitted by Carol Copeland

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## Submitter Information

**Name:** Carol Copeland

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## General Comment

Get rid of the timeline for asylum seekers so we have time to check them out and see who they are!!

AR004015

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2249

Comment Submitted by Connie Lindquist

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## Submitter Information

**Name:** Connie Lindquist

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## General Comment

Stop sending criminals back into the streets, we have enough problems with your immigration policy failures and your sanctuary cities.

It's disgusting how the citizens of this country, for whom you work, are being treated.

AR004016

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2250

Comment Submitted by Bernard Geiger

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## Submitter Information

**Name:** Bernard Geiger

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## General Comment

President Trump needs much more than 30 days to vet many asylum seekers. Please give the Trump Administration whatever time it needs to thoroughly check the background of every asylum seeker. Forcing it to cut corners endangers and puts Americans greatly at risk unnecessarily just because some bureaucrats wrote a ridiculous timeline. We've had enough crimes committed by unvetted or improperly vetted aliens.

AR004017



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d72-xkx9
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2251

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose USCIS's proposal to eliminate the 30-day processing regulation for initial asylum EADs. I volunteer regularly with asylum seekers in various states, and the steady dismantling of our asylum system is a tragedy. Please do not allow this to continue. It is not who we are as a people. Due process and the right to legal representation must be upheld for everyone.

AR004018

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2252

Comment Submitted by Carime Lee

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## Submitter Information

**Name:** Carime Lee

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## General Comment

I support asylum seekers and there ability to work while their applications are pending. Let us not forget we are a nation built on the values that those who need help can always look to this great nation for support and refuge.

AR004019

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d6r-4ik3
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2253

Comment Submitted by N M

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## Submitter Information

**Name:** N M

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## General Comment

This is yet another cynical attempt to curtail the rights and well-being of desperate people. Enough already. I have worked extensively with migrant families as a volunteer translator and if USCIS ever actually asked desperate people why they come or who they are or what their condition is, perhaps it would think twice about such wrongheaded, cruel, and idiotic proposals.

AR004020

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2254

Comment Submitted by Jake Pollock

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## Submitter Information

**Name:** Jake Pollock

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## General Comment

I support making the path towards asylum easier, more humane, and more equitable for all; as such, the existing asylum work authorization procedure and timeline that has been in place for over two decades should be kept and honored by the government. The current assault on the rights of asylum seekers by the current administration is both immoral and unlawful.

AR004021

# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k3-9d6r-3c91
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2255

Comment Submitted by Margaret Brown

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## Submitter Information

**Name:** Margaret Brown

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## General Comment

Tell DC to help President Trump secure Americas safety by removing this arbitrary bureaucratic timeline.

AR004022

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2256

Comment Submitted by Mikki Thiele

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## Submitter Information

**Name:** mikki thiele

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## General Comment

please do not continue timelines which do not fit with present situation. no catch and release, no timelines which cannot be fulfilled do to today's circumstances.

AR004023

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Tracking No.</b> 1k3-9d73-te6e
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2257

Comment Submitted by Koby Polaski

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## Submitter Information

**Name:** Koby Polaski

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## General Comment

Asylum seekers are the most vulnerable among us. They file asylum applications because they fear for their lives. Delaying or preventing their ability to apply for work authorization will not stop them from coming to the U.S. and will not stop people from applying for asylum. It will simply create a larger group of people who cannot work lawfully and cannot contribute to the U.S. economy. It also inflicts additional suffering on people who are already suffering unimaginably. Please do not implement this rule. It is not good for anyone.

AR004024

# PUBLIC SUBMISSION

**As of:** September 15, 2020  
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**Submission Type:** Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2258

Comment Submitted by Sarah Murphy

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## Submitter Information

**Name:** Sarah Murphy

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## General Comment

Delays in asylum seekers getting their work authorization approval can lead to Lost income to the asylum seeker and their family, Food insecurity, Inability to secure a valid ID, Risk of homelessness/housing insecurity, Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify), Vulnerability to exploitation, trafficking, and underground economy risks, Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income), Loss of ability to support themselves and their families, and Feelings of fear, desperation, and overall mental health concerns.

Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

Lost Tax Revenue for the Government. USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

AR004025



# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-h5i8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2259

Comment Submitted by Julio Moreno

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## Submitter Information

**Name:** Julio Moreno

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## General Comment

Allow people seeking refuge to work to provide for themselves and their family. Instead of making it harder we should be making it easier for people to work legally.

AR004026

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d74-8bh8
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2260

Comment Submitted by Alexis Steele

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## Submitter Information

**Name:** Alexis Steele

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## General Comment

Re: Proposed Rule Change to 30-day processing of EAD applications for asylum applicants

The recently proposed rule to eliminate the 30-day processing time for employment authorization documents for asylum applicants should not come into effect. Removing the 30-day rule would be harmful to asylum applicants, who already must wait 150 days before applying for work authorization. Asylum applicants need work authorization soon not later for a multitude of reasons that benefit the general public. As a matter of safety, it is important that asylum seekers are able to work with authorization so that they can provide for shelter and food for themselves and children while waiting on their case to develop. When individuals do not have the authorization to work, the fact is they do not have lawful means to provide for themselves and are therefore dependent on others and/or very vulnerable to exploitation. When these vulnerable individuals are taken advantage of because they do not have a lawful means to get by, the entire community is less safe with an environment where perpetrators can easily exploit others. Alternatively, if asylum seekers are fortunate enough to have community members helping them as they wait to be able to lawfully provide for themselves while waiting on their applications or court dates, as they are obligated to do, it is harmful to fostering economic independence and a loss in taxable income to create more barriers to asylum seekers ability to work. This rule simply does not make sense. If USCIS needs more time to process EAD applications, if that is genuinely the prompt for this proposed rule change, allow applicants to submit work authorization documents earlier than after 150 days of pendency and increase the processing time by the number of days earlier they are able to apply.

Thank you for considering how this rule change would be harmful to the whole community.

AR004027

# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k3-9d74-t9ql
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2261

Comment Submitted by Teresa Phillips

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## Submitter Information

**Name:** Teresa Phillips

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## General Comment

The USA is a country of immigrants. Unless a person is a Native American, or has ancestors who were brought here by force, every person in the US is an immigrant or a descendant of an immigrant. If we want our country to thrive, we need to ensure that people can work. LET THEM WORK. They can then provide for their own housing, food and other needs.

AR004028

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d74-chat
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2262

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

To whom it may concern:

I am worried about the problems created by not allowing asylum seekers to obtain work permits within the allotted 180 days. The government needs to comply with the rule established in 1994 to give asylum seekers their work permits within 30 days of applying. This is a strong tradition passed down by respected governmental leaders and shows some of the humanity that the United States still has. However, if this regulation is removed, more than just asylum seekers will be affected. Can you image the people of this fair nation to allow people to starve or to be left homeless? You will be putting further burdens on your citizens by refusing to allow asylum seekers to provide for themselves. They want to work, they want to be self sufficient, but not permitting them to do so causes them to become even more dependent on others and on you. Their children will still need care and we have not gone so far as to allow children to suffer because we are unwilling to help the parents, have we?

Please, please, please, do not allow this change to go through.

AR004029

# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k3-9d73-ji1g
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

## Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

## Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2263

Comment Submitted by Carrie Galatas

## Submitter Information

**Name:** Carrie Galatas

## General Comment

It is vital that asylum seekers be allowed to work while their cases are processed. Many of these vulnerable people have families to support. The children of asylum seekers enroll in public schools. Schools care about all children and are responsible for educating all children regardless of their immigration status. Families who cannot provide the basic necessities for their children at school increase the burden on already underfunded schools to provide the basics for these deserving children. No one wins when people are not allowed to work. Changing this regulation would be cruel and is completely unnecessary.

AR004030

# PUBLIC SUBMISSION

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<b>Posted:</b> November 08, 2019
<b>Tracking No.</b> 1k3-9d73-pxsi
<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2264

Comment Submitted by Nicholas Marritz

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## Submitter Information

**Name:** Nicholas Marritz

**Address:**

1240 16th St. NE

Washington, 20002

**Email:** nmarritz@gmail.com

**Phone:** 4129659554

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## General Comment

Dear USCIS:

I am writing in strong opposition to your agency's proposal to remove the 30-day deadline for processing asylum seekers' work permit applications. I work with the immigrant community in Virginia, and I know all too well what kind of devastating effects this rule would have were it to be issued.

First of all, the effects on asylum seekers' health and well-being would be extremely harmful. Without the ability to work, asylum seekers and their families will lose desperately-needed income. This will lead to food insecurity, housing instability, and an inability to access medical care. The humanitarian consequences would be dire.

Second, the proposed rule would create a burden on the taxpayer. Without the ability to work, asylum seekers will be dependent on taxpaying friends and relatives and on state and local charities and public-assistance programs to meet their basic human needs. An agency that is so concerned about immigrants being a "public charge" should make it easier for asylum seekers to earn a living on their own, through their work.

Third, agencies should generally try to be more efficient, not less. The 30-day provision ensures that USCIS processes work permit applications in an efficient and predictable manner. There is simply no reason to scrap it and replace it with no timeline at all.

For these reasons, the proposed rule should be rejected in its entirety.

AR004031

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2265

Comment Submitted by Ryan Suto, Arab American Institute

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## Submitter Information

**Name:** Ryan Suto

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## General Comment

November 8, 2019

Re: U.S. Citizenship and Immigration Services (USCIS) Proposed Rule  
Federal Register Number: 2019-19125

Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications

The Arab American Institute opposes this proposed rule change. At present, as a result of *Rosario v. USCIS*, No. 2:15-cv-00813-JLR (W.D. Wash.) USCIS is required to adjudicate initial asylum employment authorization document (EAD) applications within 30 days. In response, USCIS has simply proposed to eliminate the 30-day deadline via this rulemaking process.

If implemented this rule would cause asylum seekers, who are fleeing dangerous conditions abroad, to lose wages and benefits as a result of delayed entry into the U.S. labor force, harming their ability to support themselves and their families. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation.

Moreover, there is no administrative justification for this rule change. USCIS has stated that it has been able to decide over 99% of EADs within the 30-day timeframe for over the past year. If USCIS were to desire more time to process each request in order to increase flexibility and free up resources to work on other applications, it could instead shorten the waiting time before asylum-seekers are allowed to submit their application. USCIS has proven its ability to adequately vet the number of requests in a timely fashion.

AR004032

This rule is not necessary, would not increase the quality of the asylum process, and the loss of income for asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. For these reasons, we oppose this proposed change.

Respectfully,

Maya Berry  
Executive Director  
Arab American Institute

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## **Attachments**

Comment-Removal of 30-Day Processing Provision for Asylum EADs

AR004033





November 8, 2019

Re: U.S. Citizenship and Immigration Services (USCIS) Proposed Rule  
Federal Register Number: 2019-19125

**Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications**

**The Arab American Institute opposes this proposed rule change.** At present, as a result of *Rosario v. USCIS*, No. 2:15-cv-00813-JLR (W.D. Wash.) USCIS is required to adjudicate initial asylum employment authorization document (EAD) applications within 30 days. In response, USCIS has simply proposed to eliminate the 30-day deadline via this rulemaking process.

If implemented this rule would cause asylum seekers, who are fleeing dangerous conditions abroad, to lose wages and benefits as a result of delayed entry into the U.S. labor force, harming their ability to support themselves and their families. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation.

Moreover, there is no administrative justification for this rule change. USCIS has stated that it has been able to decide over [99% of EADs within the 30-day timeframe for over the past year](#). If USCIS were to desire more time to process each request in order to increase flexibility and free up resources to work on other applications, it could instead shorten the waiting time before asylum-seekers are allowed to submit their application. USCIS has proven its ability to adequately vet the number of requests in a timely fashion.

This rule is not necessary, would not increase the quality of the asylum process, and the loss of income for asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. For these reasons, we oppose this proposed change.

Respectfully,

A handwritten signature in black ink, appearing to read "Maya Berry". The signature is fluid and cursive, with a long, sweeping line extending from the end.

Maya Berry  
Executive Director  
Arab American Institute

AR004034

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2266

Comment Submitted by Scott Messinger

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## Submitter Information

**Name:** Scott Messinger

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## General Comment

The administration is ignoring our international obligations by continuing to limit the rights of asylum seekers. American should be a beacon to the world as a bastion of freedom, where those that are persecuted can seek refuge and safety. Instead we are now treating asylum seekers, those that are most vulnerable, as criminals. It is not criminal to seek asylum. It is often the last hope of desperate people fleeing desperate situations. Denying work authorization is simply a way to deter people from applying for asylum.

To deny employment authorization to asylum applicants will create a class of people unable to provide for themselves and their families while they wait for their cases to process. Asylum seekers should not be denied the means to provide for themselves while they follow the law and our system of having their applications adjudicated.

AR004035

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2267

Comment Submitted by Kerry McGuire

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## Submitter Information

**Name:** Kerry McGuire

**Address:**

1422 5th St NE

Minneapolis, MN, 55413

**Email:** [kerry.mcguire@ilcm.org](mailto:kerry.mcguire@ilcm.org)

**Phone:** 6516411011

**Fax:** 6516411131

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## General Comment

I am an immigration service provider who works closely with asylum seekers. I directly see the impact of these regulations on asylum seekers.

The proposal does not make sense, and its intent is to harm asylum seekers without any benefit to the United States. This proposed rule change is part and parcel of this administration's effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

Asylum seekers already wait at least 150 days before applying for an EAD. It is very difficult for asylum seekers to live in a new country without the economic means to support themselves. The fact that asylum seekers wait the 150 days is a testament to their fear of return. This would further harm asylum seekers and their ability to prepare their case and make them more vulnerable to human trafficking.

It would also hurt the United State. The U.S government will lose \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to

AR004036

Medicare and social security.

This proposed change does not solve the issue it purports to solve. USCIS should permit filing at 120 days instead of 150 days if processing times are a concern. However, USCIS has been able to adjudicate 99% of EADs within the 30 days. There is no need for this change.

AR004037

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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2268

Comment Submitted by Catherine Picker

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## Submitter Information

**Name:** Catherine Picker

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## General Comment

I strongly oppose the administration's proposal to eliminate the 30-day processing requirement for employment authorization on behalf of asylum applicants. If the proposal becomes final, it could mean lengthy delays for asylum-seekers to obtain permission to work and a host of negative consequences for asylum-seekers and their personal networks, the organizations that support them, and the private sector. The proposed rule is just another short-sighted, cruel and politically-motivated measure targeting the most vulnerable immigrants. The administration claims this rule would permit reallocation of resources to address lengthy backlogs in other areas, but this is a spurious argument. The administration has allowed these backlogs to balloon over the past 2.5 years as part of a multi-faceted attack on immigrants in general. Using this as a pretext for erecting further barriers for those seeking safety and security is obscene. It also grossly underestimates the harm the will result, not only to the asylum seekers themselves, who already struggle with the trauma they experienced and desperately need the stability and dignity that lawful employment would provide, but to the small businesses, communities and general public who would lose asylum seekers' participation as workers, consumers and tax payers. How is this responsible public policy? It is just animus, pure and simple, looking for justification in a false narrative of bureaucratic expediency. The American people are watching, and we do not like what we see.

Catherine Picker

AR004038

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**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2269

Comment Submitted by Howard Zucker, New York State Department of Health

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## Submitter Information

**Name:** Howard Zucker

**Submitter's Representative:** Howard A. Zucker, M.D., J.D., NYSDOH Commissioner of Health

**Organization:** NYS Department of Health

**Government Agency Type:** State

**Government Agency:** New York State Department of Health

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## General Comment

As discussed more fully in the attached comments, the New York State Department of Health (NYSDOH) finds that, if implemented, this Proposed Rule would make it harder for asylum applicants to earn income while awaiting a decision on their asylum application, and without a source of income, asylum applicants are more likely to become homeless or to remain homeless for a longer period of time, which will have particularly devastating health consequences for children. Moreover, without authorization to work, asylum applicants may need to rely on public assistance benefits, including State-funded Medicaid and the Special Supplemental Nutrition Program for Women, Infants and Children (WIC). NYSDOH is concerned that asylum applicants may be unable to navigate the application processes given their limited time in the United States or may be fearful of applying for public assistance benefits given the chilling effects of DHS's Inadmissibility on Public Charge Grounds Final Rule. In either scenario, asylum applicants may forego assistance for which they are otherwise eligible, leaving them without vital support during the time they cannot earn income. For these reasons, discussed in further detail in the attached comments, NYSDOH strongly urges DHS not to adopt the Proposed Rule.

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## Attachments

NYSDOH Asylum Work Authorization Comment (final signed)

AR004039



## Department of Health

**ANDREW M. CUOMO**  
Governor

**HOWARD A. ZUCKER, M.D., J.D.**  
Commissioner

**SALLY DRESLIN, M.S., R.N.**  
Executive Deputy Commissioner

November 8, 2019

Samantha Deshommes, Chief Regulatory Coordination Division  
Office of Policy and Strategy  
United States Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, DC 20529-2140

Re: DHS Docket No. USCIS-2018-0001

To Whom It May Concern:

The New York State Department of Health (NYSDOH) submits the following comments in opposition to the Notice of Proposed Rulemaking titled "Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications" (84 Fed. Reg. 47148). NYSDOH supervises the administration of a wide range of programs that provide services and support to low-income families and individuals. The mission of NYSDOH is to protect, improve and promote the health, productivity and well-being of all New Yorkers.

Thank you for the opportunity to comment.

Sincerely,

Howard A. Zucker, M.D., J.D.  
Commissioner



**New York State Department of Health**  
***Comments in Response to the Department of Homeland Security's***  
***Notice of Proposed Rulemaking***

**I. EXECUTIVE SUMMARY**

The New York State Department of Health (NYSDOH) strongly opposes the proposed regulatory changes outlined in the U.S. Department of Homeland Security's (DHS) Notice of Proposed Rulemaking titled, "Removal of 30- Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications" (hereinafter, Proposed Rule).<sup>1</sup>

The Proposed Rule would increase the amount of time that asylum applicants must wait to receive an Employment Authorization Document (EAD). If implemented, this regulation would make it harder for asylum applicants to earn income while awaiting a decision on their asylum application. Without a source of income, asylum applicants are more likely to become homeless or to remain homeless for a longer period of time, which will have particularly devastating health consequences for children.

Moreover, without authorization to work, asylum applicants may need to rely on public assistance benefits, including State-funded Medicaid and the Special Supplemental Nutrition Program for Women, Infants and Children (WIC). NYSDOH is concerned that asylum applicants may be unable to navigate the application processes given their limited time in the United States or may be fearful of applying for public assistance benefits given the chilling effects of DHS's Inadmissibility on Public Charge Grounds Final Rule (hereinafter, Public Charge Rule).<sup>2</sup> In either scenario, asylum applicants may forego assistance for which they are otherwise eligible.

For these reasons, discussed in further detail below, NYSDOH urges DHS not to adopt the Proposed Rule.

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<sup>1</sup> Removal of 30- Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, 84 Fed. Reg. 47148 (proposed September 9, 2019) (to be codified at 8 CFR Part 208).

<sup>2</sup> Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41292 (published August 14, 2019). *See also* Fiscal Policy Institute, "Only Wealthy Immigrants Need Apply: How a Trump Rule's Chilling Effect Will Harm New York," (Oct. 2018), <http://fiscalfpolicy.org/wp-content/uploads/2018/10/US-Impact-of-Public-Charge.pdf> [explaining chilling effects of the Public Charge Rule].



## II. HEALTH IMPACTS OF THE PROPOSED RULE

### 1. *Increased Risk of Homelessness*

NYSDOH is deeply concerned that the Proposed Rule will increase homelessness. By delaying employment authorization and thus hindering the ability to work, asylum applicants will not have access to income. Indeed, DHS estimates that “[t]he lost compensation to asylum applicants could range from \$255.88 million to \$774.76 million annually depending on the wages the asylum applicant would have earned.”<sup>3</sup> Moreover, asylum applicants without an EAD are ineligible for Safety Net Assistance (SNA), a State-funded benefit that provides cash and non-cash benefits, such as shelter allowance. Unable to support themselves or receive SNA, asylum applicants will face undue financial strain because of the Proposed Rule. As a result, NYSDOH anticipates that many asylum applicants will not be able to afford housing and become homeless.

Homeless people are three to six times more likely to become ill than housed people and three to four times more likely to die than the general population.<sup>4</sup> Homelessness hinders good nutrition and personal hygiene, and conditions that require regular treatment, such as tuberculosis and HIV/AIDS, are often inadequately treated.<sup>5</sup> Diseases that are common among the homeless population include chronic diseases such as heart disease, cancer, liver disease, kidney disease, and HIV/AIDS. People who live on the streets or spend most of their time outside are also at high risk for frostbite, immersion foot, and hypothermia.<sup>6</sup>

These adverse health risks of homelessness are particularly devastating for children, as it can inhibit their physical health and emotional, cognitive, social, and behavioral development.<sup>7</sup> Homeless children are more likely to experience physical and behavioral health problems with less access to medical, dental, and mental health care.<sup>8</sup> Homeless children often have significant psychosocial development issues, and their education is frequently interrupted.<sup>9</sup>

Developmental delays in homeless children start to present at 18 months of age and impact how a toddler can handle stress. Most children who are homeless under the age of five have at least one developmental delay, and half of all children who are homeless have two or more

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<sup>3</sup> 84 Fed. Reg. at 47150

<sup>4</sup> National Coalition for the Homeless. “Health Care and Homelessness.” (2009). <https://www.nationalhomeless.org/factsheets/health.html>

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> Sandel, M., et al. “Compounding Stress: The Timing and Duration Effects of Homelessness on Children’s Health” (June 2015). <https://childrenshealthwatch.org/compounding-stress-the-timing-and-duration-effects-of-homelessness-on-childrens-health-2/>.

<sup>8</sup> Dwomoh, I., Dinolfo, E.A. *Effects of Homelessness on Children*. Pediatrics in Review 2018; 39; pp. 530-532

<sup>9</sup> Chilton LA, Handal GA, Paz-Soldan GJ, et al. Providing care for children and adolescents facing homelessness and housing insecurity. Pediatrics 2013; 131(6). pp. 1206-1210.

developmental delays.<sup>10</sup> Additionally, studies demonstrate that homeless children experience toxic stress exposure, which undermines brain development and long-term functioning.<sup>11</sup>

These health effects are especially severe for very young children. Children who first experience homelessness as a toddler are at greater risk for poor achievement relative to students who have their first homeless experience later, during preschool or elementary school. Unruly behavior and withdrawal are often the initial response of children to homelessness, followed later by learning disabilities, developmental delays, and mental health issues.<sup>12</sup>

Cumulative risk scores further demonstrate that homeless children are more likely to experience poor health well into adulthood. A cumulative risk score represents a sum of the number of established risk factors present in a child's life. The higher a child's cumulative risk score, the greater the risk of developing adult risk factors for chronic diseases.<sup>13</sup> Numerous studies have found that adverse childhood experiences, including household instability and homelessness, are associated with adult health consequences. Adult health consequences include physical and psychological conditions, risk behaviors, developmental disruption, and increased healthcare utilization.<sup>14</sup>

Additionally, a recent study found a close relationship between exposure to abuse or household dysfunction during childhood and multiple risk factors for several of the leading causes of death in adults, including ischemic heart disease, cancer, chronic lung disease, skeletal fractures, and liver disease.<sup>15</sup> Studies have further shown that children who experience homelessness have the same chronic health outcomes as a child who experienced abuse or neglect.<sup>16</sup> Together, these findings demonstrate the profound long-term health consequences that homeless children face.

As the State agency whose mission is to protect, improve and promote the health, productivity and well-being of all New Yorkers, including asylum applicants, NYSDOH must oppose this Proposed Rule. NYSDOH cannot permit the adoption of a rule that risks exposing New Yorkers to these devastating short- and long-term health consequences.

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<sup>10</sup> Family Housing Fund. *Children Pay the Price for Homelessness*. (2014). <https://www.fhfund.org/fact-sheets/>. See also Center for Advanced Studies in Child Welfare. *Impact of Housing and Homelessness on Child Well-Being*. (2017). [https://casew.umn.edu/wp-content/uploads/2017/04/CW360\\_Spring2017\\_WEB508.pdf](https://casew.umn.edu/wp-content/uploads/2017/04/CW360_Spring2017_WEB508.pdf).

<sup>11</sup> Shonkoff, Jack, et al. *The Lifelong Effects of Early Childhood Adversity and Toxic Stress*. (2012). American Academy of Pediatrics, 129(1), e232-e246.

<sup>12</sup> HCH Clinicians' Network. *Protecting the Mental Health of Homeless Children and Youth* (February 2000). [https://www.nhchc.org/wp-content/uploads/2012/02/hh.02\\_00.pdf](https://www.nhchc.org/wp-content/uploads/2012/02/hh.02_00.pdf)

<sup>13</sup> Cutuli J., et al. *Promoting Resilience for Children Who Experience Family Homelessness: Opportunities to Encourage Developmental Competence*. Cityscape: A J Policy Development and Research 2014; 16(1).

<sup>14</sup> Karen A. Kalmakis ka, Chandler GE. *Health consequences of adverse childhood experiences: A systematic review*. J Am Assn Nurse Practitioners. (2015). pp. 457-465.

<sup>15</sup> Felitti V., et al. *Relationship of Childhood Abuse and Household Dysfunction to Many of the Leading Causes of Death in Adults: The Adverse Childhood Experiences (ACE) Study*. Am J Prev Med 2019; 56(6): pp. 774-786. Available online at [https://www.ajpmonline.org/article/S0749-3797\(19\)30143-6/fulltext](https://www.ajpmonline.org/article/S0749-3797(19)30143-6/fulltext)

<sup>16</sup> Firesteel. "Children and Adversity: Childhood Homelessness Can Cast a Long Shadow." *Firesteel*, 31 July 2014, <https://firesteelwa.org/2013/04/children-and-adversity-childhood-homelessness-can-cast-a-long-shadow/>

## *2. Difficulty Accessing Vital State Benefits*

### *a. Access to WIC Benefits*

NYSDOH administers a number of public health programs, many of which are available to all qualifying New Yorkers, regardless of immigration status. These programs include WIC; the Hunger Prevention Nutrition Assistance Program (HPNAP); the NYS Cancer Services Program (CSP); the Maternal, Infant and Early Childhood Home Visiting Program (MIECHV); and the Children with Special Health Care Needs (CSHCN) program.

The WIC Program, for instance, provides breastfeeding support, nutrition counseling, health education, health care referrals, referrals to other services, and nutritious foods to approximately 375,000 women, infants and children each month through 90 local providers (hospitals, local health departments, and community-based organizations) at nearly 400 service sites. The fundamental purpose of the program is to ensure the health and well-being of income-eligible families with young children.

WIC has consistently been shown to support healthy pregnancies, positive birth outcomes, and child development since it was established in the 1970s. For example, longer participation in WIC throughout the pregnancy is associated with lower risk of preterm birth and a greater chance of preventing low- or very low-birthweight.<sup>17</sup> In addition to having serious health complications, low-birthweight babies are also more likely to die in the first year of life.<sup>18</sup> WIC's intervention plays a significant role in reducing perinatal and infant mortality by ensuring adequate nutrition and healthy development in pregnancy and the first few weeks of life.<sup>19</sup>

WIC continues to offer health benefits after pregnancy has ended. Among other services, WIC promotes and supports breastfeeding by providing educational materials and one-on-one consultations with peer and professional staff and establishing a breastfeeding peer counselor program. As a result of these and other initiatives, WIC mothers have been choosing to breastfeed for longer, with one-month postpartum rates having risen 85 percent between 1998 and 2013 and the rate for 3- to 12-month-old babies having doubled during the same time period.<sup>20</sup> There is strong evidence of the strong positive health impacts of breastfeeding. Infants breastfed for 3 months are 30 percent less likely to have type 1 diabetes.<sup>21</sup> Breastfeeding is

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<sup>17</sup> Kathryn Fingar, et al., "Reassessing the Association between WIC and Birth Outcomes Using a Fetuses-at-Risk Approach," 21 J Maternal and Child Health 825 (2017); Ralitza Gueorguieva, et al., "Length of prenatal participation in WIC and risk of delivering a small-for-gestational-age infant: Florida, 1996-2004," 13 J of Maternal Child Health 479 (2009); Marianne Bitler & Janet Currie, "Does WIC Work? The Effects of WIC on Pregnancy and Birth Outcomes," 1 J of Policy Analysis & Mgmt. 73 (2005).

<sup>18</sup> Lehman Black, et al., "Effects of birth weight and ethnicity on incidence of sudden infant death syndrome," 108 J of Pediatrics 209 (Feb. 1986).

<sup>19</sup> Kathryn Fingar, et al., "Reassessing the Association between WIC and Birth Outcomes Using a Fetuses-at-Risk Approach," 21 J Maternal and Child Health 825 (2017).

<sup>20</sup> U.S. Dep't of Agriculture, "WIC Infant and Toddler Feeding Practices Study – 2: Infant Year Report," <https://fns-prod.azureedge.net/sites/default/files/ops/WIC-ITFPS2-Infant.pdf> (Jan. 2017).

<sup>21</sup> Bernardo Horta, et al., "Long-term consequences of breastfeeding on cholesterol, obesity, systolic blood pressure, and type 2 diabetes: a systematic review and meta-analysis," 104 Acta Paediatrica 30 (2015).

associated with lower rates of pediatric overweight or obesity,<sup>22</sup> and reduced risk of other chronic diseases such as cardiovascular disease, hypertension, and some forms of cancer.<sup>23</sup> Breastfeeding is also positively correlated with cognitive development.<sup>24</sup>

Into childhood, WIC's healthy food package leads to higher iron intake, which is a critical supplement for those at risk of iron deficiency.<sup>25</sup> Notably, there remain nearly 200,000 annual ambulatory care visits as a result of anemia, with most cases due to a nutritional deficiency; approximately 5,200 individuals died as a result of iron-deficiency anemia in 2015.<sup>26</sup>

WIC can provide these essential benefits to asylum applicant families, including pregnant women, mothers, and their children. However, asylum applicants may be unable to navigate the WIC application process given their limited time in the United States and, consequently, their limited familiarity with New York State governance and administrative procedures. Moreover, many asylum applicants may be fearful of applying for public assistance benefits given the chilling effects of the Public Charge Rule. Indeed, the widespread chilling effect of the Rule on WIC participation is well documented. Since the Public Charge Rule was first proposed in October 2018, WIC agencies in at least 18 states saw drops in WIC enrollment of up to 20 percent. In New York State, Public Health Solutions, the largest WIC provider in the state, saw WIC caseloads fall after press coverage of the proposed Public Charge Rule.<sup>27</sup>

As a result of their impaired ability to access WIC, asylum applicant mothers will be left without access to the crucial breastfeeding support services offered through WIC, putting their children at greater risk of adverse health impacts correlated with reductions in breastfeeding. These adverse health impacts include diabetes, obesity, and chronic disease, as well as reduced cognitive development. Additionally, without access to WIC or their own source of income, asylum applicants cannot access WIC's nutritious food package. Impeded access to healthy foods puts children at risk of anemia and pediatric obesity and opens the door to the long-term health consequences of an unhealthy diet, including adult obesity and chronic disease.

#### *b. Access to Medicaid*

An asylum applicant without an EAD is eligible for State-only Medicaid. Medicaid provides both primary health insurance coverage and supplementary coverage for low-income residents and vulnerable individuals. Health insurance increases the likelihood of people having both a usual source of care and access to care when they need it. Access to health insurance also

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<sup>22</sup> Laurence Grummer-Strawn & Zuguo Mei, "Does Breastfeeding Protect Against Pediatric Overweight? Analysis of Longitudinal Data From the Centers for Disease Control and Prevention Pediatric Nutrition Surveillance System," 113 *Pediatrics* 81 (2004).

<sup>23</sup> Colin Binns, et al., "The Long-Term Public Health Benefits of Breastfeeding," 28 *Asia Pacific J. of Public Health* 7 (Jan. 2016).

<sup>24</sup> *Id.*

<sup>25</sup> See Steven Yen, "The effects of SNAP and WIC programs on nutrition intakes of children," 35 *Food Policy* 576 (2010).

<sup>26</sup> Ctrs. for Disease Control and Prevention, "National Center for Health Statistics: Anemia or Iron Deficiency," (Mar. 2017), <https://www.cdc.gov/nchs/fastats/anemia.htm>.

<sup>27</sup> Helena Bottemiller Evich, "Immigrants, fearing Trump crackdown, drop out of nutrition programs," *Politico* (online, Sept. 3, 2018), <https://www.politico.com/story/2018/09/03/immigrants-nutrition-food-trump-crackdown-806292>.

improves the likelihood that patients receive recommended and potentially life-saving care.<sup>28</sup> Studies have also shown expanded Medicaid is associated with positive outcomes including lower mortality rates, higher cancer detection rates, and lower infant mortality rates.<sup>29</sup>

State-only Medicaid is likely the only affordable health insurance option for asylum applicants who do not have an EAD and therefore do not have the possibility of employer-sponsored health insurance. Notwithstanding their eligibility, NYSDOH expects that many asylum applicants will likely be deterred from applying for State-only Medicaid out of concern that receipt of any form of public assistance will harm their ability to adjust status under DHS's Public Charge Rule. Without access to affordable health insurance, New York's asylum applicants will go without preventive care, potentially leading to more acute and more difficult-to-treat conditions in the future.

### **III. CONCLUSION AND RECOMMENDATIONS**

By making it harder for asylum applicants to earn an income, the Proposed Rule will impair the health and well-being of New York's asylum applicants. Without income, asylum applicants will be less able to afford housing, increasing the likelihood that they and their children will become homeless. Although Medicaid and WIC are available to alleviate this lack of income, NYSDOH is deeply concerned that asylum applicants will be unable or too afraid to access such assistance. In sum, NYSDOH fears that the Proposed Rule will leave many asylum applicants both without financial resources and without necessary support to thrive, putting them at risk of short- and long-term adverse health consequences.

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<sup>28</sup> Baicker, Katherine, et al. 2013. "The Oregon Experiment-Medicaid's Effects on Clinical Outcomes." *New England Journal of Medicine* 368, no. 18: 1713-1722. <https://www.nejm.org/doi/full/10.1056/nejmsa1212321>

<sup>29</sup> Antonisse, L., et al. "The effects of Medicaid expansion under the ACA: updated findings from a literature review." San Francisco (CA): Henry J. Kaiser Family Foundation; 2018 Mar. <https://www.kff.org/medicaid/issue-brief/the-effects-of-medicaid-expansion-under-the-aca-updated-findings-from-a-literature-review-march-2018/>

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**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2270

Comment Submitted by Eric Pavri, Catholic Charities of Central Colorado

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## Submitter Information

**Name:** Eric Pavri

**Address:**

Catholic Charities of Central Colorado

228 North Cascade Avenue

Colorado Springs, CO, 80903

**Email:** epavri@ccharitiescc.org

**Phone:** 719-866-6450

**Fax:** 719-636-1216

**Organization:** Catholic Charities of Central Colorado

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## General Comment

I am the Director of Family Immigration Services at Catholic Charities of Central Colorado. I write to oppose the proposed rule to remove the requirement to process Employment Authorization applications within 30 days.

Catholic doctrine teaches us that bonds between parents and children, between spouses, and between other loved ones are the very foundation of our society. Our office serves many asylum seekers who have fled horrific situations, and reached the United States because they believe that we are the only nation strong and compassionate enough to protect them. These are not people seeking a handout - very much to the contrary, once here, they wish to work to support their families. I know many US citizens who are lazy and just want to live off the government dole. Frankly, I find it refreshing and energizing to our city, Colorado Springs, that the new people arriving here desire to work hard and support their families. Those are exactly the sort of people I want in my neighborhood and my economy. It makes no sense to create obstacles to them being able to work, if they want to do honest work for honest pay and support their families. The alternative is forcing them to either work "under the table" (which isn't good for anyone, them or the US citizen job seekers) or for them to seek charity, straining our already stretched nonprofit sector. If someone wants to support their children through honest hard work, we should support that, not prevent it.

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**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2271

Comment Submitted by Mark Curley

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## Submitter Information

**Name:** Mark Curley

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## General Comment

Please do not change the current regulations which require the government to process asylum-based EAD applications within 30 days. Asylum seekers already have to wait 150 days to file the EAD application. They cannot apply for a Social Security number until they have an EAD. They cannot apply for drivers licenses in most states without a SSN and EAD. Everything flows from the EAD.

Also, without an EAD, asylum seekers cannot work in the U.S. and support themselves. Without income, they and their families will become dependent on the government to survive. Without employment, they are not paying income and payroll taxes. So, delaying the EAD issuance will cost Americans more money than issuing the EAD as quickly as possible.

AR004048

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2272

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Preventing timely access to work authorization documents for asylum seekers does not serve any interest of the United States. Work authorization is a lifeline for desperate families in crisis, often with children to care for. I represent asylum seekers who, once in the U.S., are struggling to gain basic security like shelter, food, and basic medical care for their families.

They have been through significant trauma, and in most cases are experiencing ongoing trauma from threats and forced migration. Timely access to work authorization allows these families to have a form of ID, and allows adults to work and provide basic security for themselves and their children. It is cruel to bind access to this simple benefit.

This government, which on one hand says that immigrant families should pay their own way or be kept out of the U.S., is at the same time attempting to prevent vulnerable people from being able to work and support themselves while they wait for a decision in their cases. The 30 day regulation should remain in place.

AR004049



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2273

Comment Submitted by Angela Cifor

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## Submitter Information

**Name:** Angela Cifor

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## General Comment

My name is Angela Cifor and I am a practicing immigration attorney in Denver, Colorado. I represent many asylum-seekers who have fled unspeakable violence in their home countries. I believe the proposed changes to the regulations will result in significant harm to both asylum-seekers and our government.

If the proposed regulations go into effect, asylum-seekers will lose their ability to earn an income and support themselves and their dependents while they await adjudication of their asylum applications. USCIS admits that lost compensation to asylum-seekers would range from \$255.88 million to \$774.76 million in taxable income per year. This, in turn, would increase the population of public charge noncitizens in the United States, an outcome this presidential administration is actively working to avoid.

In addition, the proposed regulations would result in a loss of tax revenue that would otherwise directly benefit the United States government. USCIS admits that all levels of government would lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum-seekers and their employers from contributing to Medicare and social security.

Finally, the proposed regulations would further the systematic suppression of asylum-seekers and their ability to pursue a legal immigration benefit.

In the alternative, USCISs stated aim of increasing their processing times for EAD applications would still be achieved if asylum-seekers were able to submit their EAD applications 120 days after filing their asylum applications with USCIS or the Immigration Court.

Thank you for considering this comment.

AR004050

# PUBLIC SUBMISSION

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2274

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I think it is unwise to delay the processing of employment authorization documents because it causes vulnerability for the families who require income and lead to problems like exploitation and food insecurity. So many things in the United States are already barred from them for not having a US for of identification. It is important for them to be able to identify themselves. This includes schools, travel, and community services. Asylum seekers pay taxes with their wages and contribute to the economy in the United States it would be a detriment to the country as well as these families to have any delay in the processing of these applications.

AR004051

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2275

Comment Submitted by Timothy Muth

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## Submitter Information

**Name:** Timothy Muth

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## General Comment

The proposed regulation is an approach which is fiscally foolish. If the government allows itself more time to assess EAD requests, it is postponing its ability to collect employment related taxes from people willing and able to work in the US economy, and instead requiring them either to work in the shadows of the cash economy or to soak up resources from families and charities when they can't work. The proposed regulation seems to be intended only to have the prohibited purpose of punishing asylum seekers who have already demonstrated a credible fear of danger in their home countries.

If the reason for this regulation is a current need for more than 30 days to process applications, then the proper response is either to deploy more resources to speed up processing time, or to obtain more time by allowing asylum seekers to submit their applications for EADs soon after their asylum application is filed.

AR004052

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2276

Comment Submitted by Francesc Ortega, City University of New York, Queens College

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## Submitter Information

**Name:** Francesc Ortega

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## General Comment

See attached file(s)

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## Attachments

11.08.19 FINAL professorial\_comment from Professor Ortega and Professor Hunt

AR004053

# **Professorial Comment of the Proposed Removal of the 30-Day Processing Provision for Employment Authorization Applications by Asylum Applicants**

Federal Register, Vol. 84, No. 175, 9/9/2019

## **Authors:**

Francesc Ortega (City University of New York, Queens College)

Jennifer Hunt (Rutgers University)

## **Executive Summary**

In general, the approach employed by the U.S. Department of Homeland Security (DHS) to estimate the effects of the proposed rule is reasonable. However, the implementation is problematic for a number of reasons. As a result, the estimated costs to the economy of the proposed rule are likely to be underestimated.

## **Problems with the DHS analysis**

### 1. The counterfactual scenario that is being considered is unrealistic.

The baseline scenario is the current 30-day rule for the processing of EAD applications. The main counterfactual scenario is the removal of the deadline and the assumption that the processing times would resemble those of FY2017. More specifically, the DHS assumes that the average processing time would increase by 31 days.

However, USCIS data shows rapid growth in the number of applications over the last few years. The number of employment authorization petitions (initial I-765 receipts) has grown by over 50% (year on year) in each fiscal year between 2013 and 2017), as shown in Table 8. Therefore, absent staff increases, it is unrealistic to expect that the average processing time of FY2017 could be attained, since the number of petitions is likely to be much higher. In all likelihood the removal of the 30-day rule would entail an increase in average processing time substantially higher than currently assumed in the calculations.

In our view, it would be more informative to focus on counterfactual scenarios that explicitly assume alternative average processing times, along the lines of the 90-day timeframe considered in Table 12.

### 2. The focus on the overall dollar amount is problematic.

We largely agree with the range of estimated economic costs associated with each delayed work authorization.

However, we believe the aggregate dollar amounts grossly underestimate the likely losses. As discussed in the previous point, the number of EAD applications is likely to continue increasing

fast in the next few years. As a result, the projected economic cost of removing the 30-day rule is much higher than currently assumed in the analysis by DHS.

### 3. Excessively wide range of estimates.

The summary calculations in Table 10 estimate the lost compensation from removing the 30-day rule in the range of \$255.9 Million to \$774.8 Million. The former assumes that the recipients of the EAD are employed at the minimum wage (\$12.05 hourly with benefits) and the latter assumes that they receive the average wage in the economy (\$36.47 hourly with benefits).

The DHS does not provide information on the characteristics (age, education, area of residence and so on) of the EAD applicants. Consequently, it is reasonable to assume that they will be paid the average wage in the economy.<sup>1</sup> Lacking further data, we believe it is more appropriate to base the analysis on the average wage.

In addition, Table 5 considers a scenario where all asylum applicants experiencing a delay in their EAD applications will be replaced with other workers. In the current economic context, with a secular low unemployment rate (of about 3.5%), this scenario seems extremely unlikely.

Furthermore, the proposed rule change is unlikely to affect the reservation wages of non-employed workers since it would simply entail a relative short delay in the approval of the EAD application. For these reasons, the scenario where vacancies are filled with other workers can be disregarded.

### 5. Underestimated tax revenue loss.

The DHS analysis of the effects of the proposed rule on tax revenue is based solely on employment taxes, defined as Medicare and social security contributions, quantified as a 15.3% tax rate.

However, income taxes (at the federal, state and local levels) should also be factored in. Median federal income tax rates are around 16% (Congressional Budget Office, The Distribution of Household Income 2015). Hence, the overall tax rate is higher than currently assumed in the DHS analysis.

### **Our estimates**

Our baseline is the current 30-day processing rule. But we depart from the DHS analysis by considering two alternative scenarios.

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<sup>1</sup> While it may be the case that the average qualifications of some asylum seekers petitioning for employment authorization are lower than for the overall population, these individuals may compensate by working longer hours.

In the first alternative scenario, the processing deadline is extended so that the average petition is processed in 61 days. This scenario aligns with the DHS assumption of the effects of removing the 30-day rule under the presumption that the time frame of FY2017 can be maintained despite the large projected increase in applications.

We also consider an alternative scenario where the processing deadline is extended so that the average petition is processed in 91 days.

### Assumptions

A1. We adopt the same hourly compensation (including benefits) and working hours used by DHS: an average of \$36.47 per hour, which results in \$291.76 per day.

A2. Five work days in a week (21.4 work days per month). As a result, 71% of the calendar days are work days.

### Per-worker income loss

Let us first report the income lost per worker under each of the alternative scenarios.<sup>2</sup>

In the alternative scenario where the average petition is processed in 61 days, the average petitioner would entail an economic loss of \$6,460 relative to the 30-day rule baseline. This loss would increase to \$12,504 if the average petition were processed in 91 days, relative to the 30-day rule baseline.

### Aggregate income loss

The aggregate income loss is calculated by scaling the per-worker income loss using the number of EAD petitioners impacted by the change in the processing rule.

As noted earlier, this calculation requires projecting the number of EAD petitions from asylum seekers into the future. Projections far into the future are subject to high uncertainty. In contrast, projections one or two years out can be made with greater confidence. This is particularly the case here, given the steady trends in applications over the last five years.

Let us consider the alternative scenario where the average petition is processed in 61 days. It is helpful to begin using the number of EAD applications that were processed beyond the 30-day rule in FY2017, as done in the DHS analysis. In this case the aggregate income loss would be \$769.4 Million, which closely resembles the figure estimated by DHS (\$774.8 Million).

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<sup>2</sup> While we focus on worker compensation, the calculation is consistent with the reduction in Gross Domestic Product in a context where capital rental rates are unaffected by the proposed changes in rules, the economy exhibits constant returns to scale, and firms are price-takers.

However, the upward trend in receipts of EAD petitions from asylum seekers (Table 8) shows year-over-year growth rates ranging between 52% and 71% between FY2014 and FY2017. Under the assumption of 50% annual growth, the total initial receipts are projected to be 392,673 in FY2018 and 589,010 in FY2019.

In FY2017, 142,695 initial receipts were processed within the 30-day limit (implying that 45.5% of the total initial receipts were processed late). Under the assumption that the processing capabilities of the USCIS staff remain unchanged, the projected number of initial receipts that will be processed beyond the 30-day limit would rise to 249,979 in FY2018 and 446,316 in FY2019.

On the basis of these projections, the aggregate income losses are projected to be \$1,615 Million in FY2018 and \$2,883 Million in FY2019, relative to the 30-day rule base line. These aggregate losses are considerably larger than the figures emphasized in the DHS analysis.

If the average processing time became 91 days, the corresponding aggregate income losses are projected to be \$3,126 Million in FY2018 and \$5,581 Million in FY2019, relative to the 30-day rule base line.

## **Conclusion**

In light of the above analysis, we are of the opinion that DHS has likely underestimated the overall costs to the economy were the 30-day deadline replaced by the proposed regulation. We also believe that additional data points should be considered and potentially released so that a more complete evaluation may be conducted.

Sincerely,

Francesc Ortega, Ph.D.  
Dina Axelrod Perry Professor in Economics

Jennifer Hunt, Ph.D.  
Professor, James Cullen Chair in Economics



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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2277

Comment Submitted by Elizabeth Kohler Maya, Bromberg, Kohler Maya & Petre, PLLC

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## Submitter Information

**Name:** Elizabeth Kohler Maya

**Address:**

2200 Wilson Blvd.,

Ste. 205

Arlington, VA, 22201

**Email:** elizabeth@bromberglaw.com

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## General Comment

Good morning,

My name is Elizabeth Kohler Maya and I am an attorney and managing partner of Bromberg, Kohler Maya & Petre, PLLC. We are a small law firm in Arlington, VA providing immigration legal services to immigrants throughout the Washington DC metropolitan area and across the world. Throughout our more than 30 years of establishment, we have assisted numerous asylum seekers. I write to oppose the proposed regulation change which would remove the 30 day deadline for processing employment authorization applications from asylum seekers. I oppose the change as it would have devastating consequences for asylum seekers. These are summarized below:

Lost income to the asylum seeker and their family

Food insecurity

Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID.

Risk of homelessness/housing insecurity

Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify)

Vulnerability to exploitation, trafficking, and underground economy risks

Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income)

Loss of ability to support themselves and their families

AR004058

Feelings of fear, desperation, and overall mental health concerns

Our nation must uphold the ideals of due process and respect for human rights by providing swift access to employment for those who seek our safety and protection. Thank you for your consideration.

AR004059

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2278

Comment Submitted by Sarah Pisk

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## Submitter Information

**Name:** Sarah Pisk

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## General Comment

Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

Proposed Alternative: As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR004060

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2279

Comment Submitted by Katy Atkiss

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## Submitter Information

**Name:** Katy Atkiss

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## General Comment

I live in Houston, Texas where 23% of our population is foreign-born, and 26% of our economy is contributed to by foreign-born workers. Our country must let asylum seekers work -- for themselves and their families, as well as for our country's economy and well-being.

The only rationale explanation for this asinine rule change, which has been in place since 1994!, is to prove the hateful argument that immigrants aren't contributing to society. If our country changes this rule and does not allow them to, this will be true. Spurring more hate, poverty and desperation. A beautiful fabric to weave for our country.

Stop the hate. If we can't find it in us to do it for humanity, do it for the economy.

AR004061

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2280

Comment Submitted by Megan Davis

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## Submitter Information

**Name:** Megan Davis

**Address:**

1537 W Augusta Blvd

Apt 1R

Chicago, IL, 60642

**Email:** mjd0413@gmail.com

**Phone:** 312 6663430

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## General Comment

I am writing to strongly oppose the proposed regulations to eliminate the 30-day adjudication rule for pending asylum EADs. My name is Megan Davis, and I am a non-profit immigration attorney who represents asylum seekers, particularly those who are most vulnerable and have no means to afford private legal services. I have seen many asylum seekers harmed by the delay in obtaining work authorization, including through the loss of income, food insecurity, inability to obtain a valid government ID, and housing insecurity. Asylum seekers are already very vulnerable, and this unnecessary delay in getting work authorization only further compounds this issue. It also causes economic harm to the U.S. government. USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

Rather than the proposed rule, USCIS should consider alternatives to allow for additional time to adjudicate EAD applications, such as by permitting asylum seekers to file their applications after 90 or 120 days, rather than the current timeframe of 150 days. This would achieve USCIS's goal of having more time to vet and process applications without causing undue delay and hardship to asylum seekers.

For these reasons, I oppose this proposed rule and strongly urge USCIS to develop alternative regulations to address this issue.

AR004062

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2281

Comment Submitted by Julia Young

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## Submitter Information

**Name:** Julia Young

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## General Comment

My name is Julia Young and I am a professor of immigration history and immigrant advocate.

Please reject the removal of the 30-day processing provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications.

Allowing asylum seekers to work while they are here helps not only them, but also the US economy. If they cannot work, they are vulnerable to homelessness, food insecurity, and poverty. If they can work, they become contributors to our economic growth.

It also improves security in the United States. Without a work permit, asylum seekers are often unable to apply for a state ID.

It also helps to restore our reputation as a country that welcomes immigrants.

Julia Young

AR004063

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2282

Comment Submitted by Jessica Balding

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## Submitter Information

**Name:** Jessica Balding

**Address:**

2325 S Linden Court #214N

Denver, CO, 80222

**Email:** jessica@lawshaftel.com

**Phone:** 303-522-8574

**Fax:** 720-439-9409

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## General Comment

Hello, I am concerned about the ramifications of the 30 day processing provision for Asylum Applicants. I am an immigration lawyer and have seen increased USCIS delays in EAD processing across the board. According to USCIS processing times currently posted on their website, and matching what I see in my practice, EADs can take up to 19 months to process. Because an Asylum applicant can't file for an EAD until their application has been pending for 5 months, this rule would mean that Asylum applicants could go years without a work permit and without state identification (because many states require an EAD to get a state ID). It should be a basic human right to work and provide for oneself and one's family. By not granting Asylum applicants an EAD in a timely fashion, the US government will ironically be requiring asylum applicants to be reliant on the US government for basic necessities like food and housing, costing the taxpayer more.

AR004064

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2283

Comment Submitted by Heather Hansen

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## Submitter Information

**Name:** Heather Hansen

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## General Comment

I am concerned about the proposed rule change, as it could cause harm to asylum seekers and the communities in which they reside. Further delays in receiving an EAD put asylum seekers at risk of homelessness, make them more vulnerable to trafficking, and food insecurity among other concerns. Asylum seekers want to and need to legally work to support their families in the US while their legal cases are being processed.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCIS's goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR004065



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Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2284

Comment Submitted by Laura Woods

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## Submitter Information

**Name:** LAURA WOODS

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## General Comment

I don't agree with the proposed rule change. It would allow DHS to take much longer to decide whether someone seeking asylum should be issued a work permit, requiring asylum-seekers to essentially survive on others charity while our government processes paperwork.

AR004066

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2285

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

My profession includes helping immigrants obtain any kind of legal status they may be eligible for, many of these immigrants are only eligible for asylum. Although the chance of gaining legal status as an end result of applying through asylum, one of the main reasons people decide to spend thousands of dollars for this through an attorney, is because they are told they can obtain a work permit through this program. It is then that we realize all immigrants want to do is work and earn a living the rightful way in this country. They want to escape the danger of their home where they cannot provide a secure place for their family to flourish. Taking this benefit away will only make matters worse in this country of opportunity. It's time to make real, fruitful, changes, not go backwards and see how badly we can ruin lives that fled to our country only to work for a better one.

AR004067

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2286

Comment Submitted by Ronald Abramson

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## Submitter Information

**Name:** Ronald Abramson

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## General Comment

Docket No. USCIS-2018-0001

If America is all about self-sufficiency and hard work, why would we EVER seek to make it more difficult for someone to work legally?

After over two decades representing asylum-seeker in the immigration system, it is clear to me that they come to the United States seeking two things: safety and opportunity. Delaying and/or denying employment authorization is yet another cruel arbitrary policy change designed to break people's spirits, and hamper their ability to navigate an already complex and unforgiving system.

Do not eliminate the 30-day processing time provision.

AR004068

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2287

Comment Submitted by Peter Young

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## Submitter Information

**Name:** Peter Young

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## General Comment

Asylum seekers need to be able to work as they manage the immigration process. Immigrants are a fundamental part of the United States work force and this rule seems designed to discourage their participation. This hurts our country and hurts their families, and introduces additional instability into their lives at a time when they are dealing with massive disruption and stress already.

End inhumane and hostile rules like this one; our standing as a country and our future depend on it. Thank you.

AR004069

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2288

Comment Submitted by Sabine Teyssier

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## Submitter Information

**Name:** Sabine Teyssier

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## General Comment

As a legal advocate, I have witnessed firsthand the detrimental affects of the already delayed work permit process on the lives of asylum applicants and on their community. Removing the 30 day processing provision for work permits would make it impossible for asylum applicants to support themselves during an already extremely vulnerable time. This would therefore lend itself to exacerbating issues of public charge, which USCIS and this administration has already unethically attempted to use to disqualify immigrants from protections.

I wholeheartedly oppose the proposition to remove the 30 day processing provision of work permits, as it has no logical basis, and would only serve to compound the challenges that asylum applicants face in this country, while also costing the government millions in lost revenue. I urge that it be rejected.

AR004070

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2289

Comment Submitted by Mark Davidson

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## Submitter Information

**Name:** Mark Davidson

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## General Comment

Asylum seekers can only seek work authorization by statute after 150 days have elapsed since filing their cases. It is not available if the courts have already denied the asylum claim. The idea that the US government should eliminate a regulation that provides work authorization within 30 days of such application is reasonable in light of the fact the initial application is delayed so that our government can process the asylum case. If the regulations are changed to allow our government to take more than 30 days to provide work authorization to these asylum seekers, it deprives asylum applicants of an already long delayed and needed ability to support themselves during asylum proceedings. It also awards the US government's delay in processing asylum cases since work authorization can be delayed for many months (or longer) even though the US government has failed to do its job. This just doesn't seem fair.

AR004071

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2290

Comment Submitted by Jonathan Anonymous

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## Submitter Information

**Name:** Jonathan Anonymous

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## General Comment

The removal of the 30 day rule for EADs will cut employers access to good, hard working people, cut tax revenue, and is a substantial removal of procedural due process. These individuals have followed the rules in getting a work permit, and now are being punished because of the Presidents and administrations obvious pandering to their political base.

AR004072

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2291

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Delaying the processing times for EADs will affect entire families ability to provide for themselves. As is, an EAD serves not only as a measure to provide the government and the applicants an identification method, but it serves as a means to a legal work force. The EAD provides a safeguard for both those supporting immigration and those who don't because it helps track applicants. If this argument does not satisfy then why not just understand that these asylum seekers are human and deserve the ability to provide for themselves. The less asylum seekers that work, the more likely they find themselves in a destitute situation, the more likely they will need help from the government, and the public. It does not make sense to burden the system or the public, when most of these asylum seekers want to work and enhance the labor force creating more revenue in the economy and increasing the amount of taxes collected.

AR004073



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2292

Comment Submitted by Ida Gillespie

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## Submitter Information

**Name:** Ida Gillespie

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## General Comment

Please do everything to get immigration Reforms done!! The liberals are using our tax money and throwing away our Constitutional strength by allowing illegals in which we have to pay all their expenses for! This is not AMERICA! Immigration Reforms now! Thank you & God bless!

AR004074

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2293

Comment Submitted by Sylvia Campbell

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## Submitter Information

**Name:** Sylvia Campbell

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## General Comment

To the USCIS,

I urge you to keep the 30-Day Processing Provision for Asylum Applicants. These people and their children need to eat and survive, just like anyone else. They are human beings and should be treated with dignity and respect. It is adding cruelty on top of cruelty to people who have been forced to flee their home countries.

I am proud of my country. This is far below our values as a people.

Please discard this proposed rule change.

Sylvia Campbell  
Texas 77381

AR004075

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2294

Comment Submitted by Whitney Leeds

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## Submitter Information

**Name:** Whitney Leeds

**Address:**

4280 Morrison Rd  
Denver, CO, 80219

**Email:** whitney@novo-legal.com

**Phone:** 3033350250

**Fax:** 3032964586

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## General Comment

The consequences of this proposed rule change would be disastrous. As it is, asylum seekers, who are already often victimized and trauma-ridden, struggle to find counsel and meet their basic needs while awaiting the long process to adjudication of their petitions. They come from countries where they struggle immensely, only to come here and be unable to work to put food on the table. The work permit allows them to become self-sufficient, contribute to our economy, and provides them with the means to hire counsel. They are \*far\* more likely to present a successful case with counsel, so being able to afford counsel can be, for many, the difference between a life in the US or an untimely death in their countries of origin. And the sooner they are able to work, the less they need rely on charity, can start contributing taxes, and become self-sufficient. People without work permits are in an impossible situation of being unable to work legally but needing to support themselves, often forcing them to take odd jobs with employers who exploit them and violate labor and employment law, and where they become easy prey to wage theft and other abuse, only adding to the victimization that they already experienced in their countries of origin. Clearly, USCIS is capable of issuing these EADs in a timely manner, within the 30 days. In light of the immediate and disastrous harm to the public threatened by this proposed rule change, there is no legitimate reason to implement this proposal.

AR004076

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2295

Comment Submitted by Daniela Turcios

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## Submitter Information

**Name:** Daniela Turcios

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## General Comment

Hello, I am writing because the proposed change can affect many lives and not in a good way. People seeking asylum don't have it easy. They are seeking protection and opportunities to provide for their families like we all do. Reason we get up every day to make sure our families are safe with a roof over their heads and food on the table. We are all so blessed to be part of the U.S.- I urge you all to make the most humble and righteous choice. For you all will be helping many lives proper and provide. UNITED WE STAND, DIVIDED WE FALL. happy holidays everyone!

AR004077

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2296

Comment Submitted by Joel Eissenberg

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## Submitter Information

**Name:** Joel Eissenberg

**Address:**

7337 Princeton Ave

University City, MO, 63130

**Email:** flylab1@yahoo.com

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## General Comment

I oppose this proposed rule. It runs counter to the needs and goals of our country.

Removal of the 30-day processing provision will delay the ability of asylum applicants to become productive members of American society. Gainful employment is central to the American melting pot. As a society, we all gain when asylum applicants can work, and needless delay, as proposed here, harms us as a society.

AR004078

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<b>Comments Due:</b> November 08, 2019
<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2297

Comment Submitted by Catherine Cammann

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## Submitter Information

**Name:** Catherine Cammann

**Address:**

2008 Creastland Dr.

Ann Arbor, MI, 48104

**Email:** Cassie.cammann@gmail.com

**Phone:** 734-604-8878

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## General Comment

To whom it may concern,

It is very important to keep the current requirement for authorities to review the work requirement documentation in place.

Delays in getting the right to work for people fleeing a hostile situation in their homeland, is in all ways counter to our country's best interest.

Immigrants to the USA should, in my opinion be allowed to find work and begin to support themselves and their families.

Finding work is the obvious way for immigrants to begin to stabilize their new lives.

The world is full of situations where people are persecuted and when they flee to the USA, we have traditionally welcomed them and offered them asylum.

The Statue of Liberty is the symbol all over the world that we are a welcoming nation!

That is the principle on which we built a nation.

KEEP THE 30 DAY WORK PERMISSION IN PLACE

Catherine A. Cammann

AR004079

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2298

Comment Submitted by Lauren Watford

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## Submitter Information

**Name:** Lauren Watford

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## General Comment

The proposed rule should be withdrawn. DHS seeks to place a severe burden on a vulnerable population who are exercising their legal right to seek asylum. It is in the economic interest of the United States to allow asylum applicants to enter the workforce. According to the Department of Health and Human Services, refugees have contributed \$63 billion more to federal and local coffers than they receive in federal benefits. Businesses both large and small rely on the work of refugees and asylum seekers, and the rule deprives these businesses of much-needed workers.

The proposed rule also forces asylum applicants, many of whom flee torture, death threats, and sexual violence, into an impossible choice. Without the authorization to work legally, they will be deprived of the means to meet their basic needs. Thus, they are to choose between providing a basic standard of survival to their families, or return to their home country to face violence or persecution. Asylum seekers already wait 150 days or more to receive work authorization, during which time they cannot receive any government support and are forced to rely on the generosity of others for rent, food, and basic necessities.

Beyond a detriment to the national economy and asylum applicants, the rule defies a sense of dignity. It is the purpose and effect of this rule to deter asylum seekers. DHS cannot hide baseless behind claims of greater security to hide the true intention of this rule to prevent a population from accessing their legal rights. DHS would have asylum applicants be a lower class of people, stripped of legal right to provide for themselves.

With this rule, DHS makes it illegal to work. DHS uses the law to terrorize, torment, and exclude an entire population to achieve an entirely political objective. The proposed rule should be withdrawn, the DHS should continue to process EAD applications within 30 days under existing regulatory mandates.

AR004080

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2299

Comment Submitted by Courtney Butler

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## Submitter Information

**Name:** Courtney Butler

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## General Comment

My name is Courtney Butler, and I am an immigration attorney in Denver, Colorado. I am writing to oppose the proposal to eliminate the 30-day processing provision for asylum EADs.

I work with asylum seekers every day, and have for ten years. Their main goals in coming to the country are to escape extreme violence and persecution in their home countries. Most are NOT coming only to work, but to escape that extreme violence. I have had women who have been burned by their husbands, men and women who have been raped repeatedly, and people who have been thrown in prison where they were beaten, electrocuted, and shoved in barrels of water until they almost drowned. These people are only seeking the safety of the great USA, but while they are here, they want to be productive members of society. We should also want that for them. They already have to wait 180 days to file for an EAD, and often they have their final hearing before that date anyway. But if the system is delayed - like it often is - they should have the opportunity to earn income for themselves and their family, which in turn helps the US economy and prevents them from becoming a drain on resources.

USCIS has admitted that the government will lose tax revenue because of this rule - anywhere between \$39.15 million to \$118.54 million per year. Delayed work authorization will also prevent asylum seekers and their employers from contributing to Medicare and social security. Without an EAD, asylum seekers will not be able to obtain a drivers license or social security number, resulting in many driving without a license. It will also increase the risk that they are vulnerable to trafficking or exploitation.

Maintaining the 30-day rule will not harm national security interests. USCIS has decided over 99% of EADs within the 30-day timeframe for over the past year. Therefore, USCIS has proven its ability to adequately vet the amount of requests in a timely fashion. Moreover, its argument regarding increased threats serves only to prompt the need for a speedier process to properly protect national security, rather than its request to delay the process further, especially since EAD applicants are asylum-seekers already residing in the United States.

AR004081



Additionally, by removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude.

If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR004082

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2300

Comment Submitted by Patricia Freshwater

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## Submitter Information

**Name:** Patricia Freshwater

**Address:**

Dallas, TX, 75248

**Email:** tricia.freshwater@gmail.com

**Phone:** 434-409-8181

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## General Comment

I oppose this proposed regulation. It will cause harm to both the security of asylum seekers and to our government. Right now, an asylum application may have to wait several years for the government to make a decision on an application for asylum. There is nothing they can do about the government delay. The 30 day rule ensures that asylum seekers will receive work authorization after waiting for 180 days without a decision on the application for asylum. This rule makes sure that they can feed and provide housing and healthcare for themselves and their families so that they do not need government assistance, and that they can obtain state identification which also helps them to find housing, set up bank accounts, etc. They will pay taxes on the income earned. Making asylum seekers wait months or longer for the work cards they are already eligible to receive under the law will only cause more fear and desperation for people who are already in difficult circumstances.

AR004083

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2301

Comment Submitted by Sofia Mankin

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## Submitter Information

**Name:** Sofia Mankin

**Address:**

Deland, FL, 32724

**Email:** smankin@yahoo.com

**Phone:** 3868225586

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## General Comment

The proposed rule should be withdrawn because it places an unfair burden on a population that very desperately needs help and has exercised their legal right to asylum. Forcing these asylum seekers to choose between providing for their families and obeying the law is both cruel and unsustainable. Without the authorization to work legally, they will be deprived of the means to meet their basic needs. Thus, they are to choose between providing a basic standard of survival to their families, or return to their home country to face violence or persecution. Asylum seekers already wait 150 days or more to receive work authorization, during which time they cannot receive any government support and are forced to rely on the generosity of others for rent, food, and basic necessities.

With this rule, DHS makes it illegal to work. The proposed rule should be withdrawn, the DHS should continue to process EAD applications within 30 days under existing regulatory mandates.

AR004084

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2302

Comment Submitted by Dearra Godinez

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## Submitter Information

**Name:** Dearra Godinez

**Address:**

4223 Center Street  
Omaha, NE, 68105

**Email:** dearra@immigrantlc.org

**Phone:** 4028981349

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## General Comment

I am an immigration attorney at a nonprofit organization in Omaha, Nebraska, the Immigrant Legal Center. I have been practicing law since 2010.

The requirement that initial Employment Authorization Documents ("EAD") be issued to asylees within 30 days should not be eliminated. Delays in asylum seekers getting their EAD will lead to increased vulnerability to immigrants who have already risked their lives to flee persecution in their countries of nationalities. Asylum seekers need income to obtain necessities to live. Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation, and it could increase the likelihood of an already vulnerable population to be subject to exploitation and trafficking.

Additionally, elimination will result in lost tax revenue. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

Instead of elimination, I propose USCIS allow submission of an EAD application earlier to allow more time for adjudication. As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the

AR004085

waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR004086

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2303

Comment Submitted by Bonita Gutierrez

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## Submitter Information

**Name:** Bonita Gutierrez

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## General Comment

As an immigration attorney, I can say from years of experience that USCIS often takes far far too long to decide applications. This includes applications for work permits for those immigrants who qualify. Our immigrations laws provide work permits for people who have articulated a valid claim for asylum and have to wait years (sometimes many) before their asylum case is decided. This is only fair. And in my experience, USCIS already takes 4 months approximately to decide initial asylum work permit applications. This is long enough. Without any regulation providing a time deadline for USCIS to act, we attorneys fear that 4 months will morph into 6 or 12 months. This is the case for other kinds of work permits -- e.g. work permits for immigrants whose E-42B application is pending. For these folks, USCIS takes anywhere from 7-10 months to decide a work permit application. Regulations must provide for timely adjudication of applications -- otherwise, CIS will have free rein to delay delay delay. The current administration has called for timely adjudication of immigration cases -- well, let that include timely decisions on work permits as well. This is a matter of fairness.

AR004087

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2304

Comment Submitted by Andrea Pena

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## Submitter Information

**Name:** Andrea Pena

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## General Comment

I am an associate attorney at an Immigration and Family Law Firm. My parents are immigrants and so is my husband. I have personally lived with watching people I care about struggle to obtain status and struggle with more than one job because they cannot go to school or get better employment. Not because they are not qualified but because they cannot pass the employment verification or obtain a social security number.

Removing this benefit is counterproductive to American values. We are considered the "land of opportunity" but yet we refuse to give people running for fear of persecution the opportunity to try to assimilate to our culture. Americans expect immigrants who intend to live in our country to contribute and not be "relying on the government for help", yet we expect this without giving them the tools necessary to be successful. Removing this employment authorization not only hurts the immigrants because they will not be able to provide for their families but it also hurts America because we will certainly have more people asking for government help. Without this employment authorization, immigrants will not be able to provide basic needs for themselves or their family. We are setting them up for failure without substantial proof that removal of such document will be beneficial to Americans. Furthermore, keeping the EAD permit for immigrants allows the US Government to monitor such individuals, screen them for any criminal issues that could arise and only increases the number of people that will be paying taxes and adding American dollars to the economy.

I ask that you consider these repercussions and not remove such document.

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2305

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Asylum seekers are here legally following the process to immigrate within the confines of the law. They should be permited to support themselves while they await a decision on their immigration and there's no reason to make doing so harder than necesarry. This change to the law is foolish and misguided, I find it bizarre that the same people who so often refer to immigrants as lazy and leeching off of this country also want to make it harder for them to work. I cannot support this change and hope to see more comments from others who understand the negative effect this would have, both on legal immigrants and on our country.

AR004089



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2306

Comment Submitted by Douglas Dionne

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## Submitter Information

**Name:** Douglas Dionne

**Address:**

1190 Lincoln Ave

Ste. 5

San Jose, CA, 95125

**Email:** dionnelegal@gmail.com

**Phone:** 669-292-5044

**Fax:** N/A

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## General Comment

My name is Douglas Dionne. I am an immigration attorney who runs my own solo law firm. I am writing to oppose the proposed change to the 30-day EAD adjudication regulation because it will cause unnecessary and severe financial harm to families fleeing persecution.

The current regulation essentially prioritizes the adjudication of EADs for asylum applicants for important reasons, such as the need to work to financially support themselves and derivative family members, the need to pay for legal services to present the asylum claim, and recognition of the fact that asylum applicants are particularly vulnerable economically because they are, by definition, seeking protection from the US after fleeing their home country. These are good reasons to prioritize the adjudication of EADs for asylum applicants which justify maintaining the 30-day rule without change.

As a lawyer serving the low-income immigrants, I have to put roughly 99% of my asylum seeking clients on payment plans because they do not have assets to make a large down payment or to cover a retainer fee. Delaying work authorization for these clients will make it even harder for them to secure the legal services necessary to present their asylum claims. Without legal representation, most asylum applicants will have to ask for continuances and extensions to present their case, thereby delaying adjudication of the case. In other words, de-prioritizing EADs for asylum applicants will work to increase the backlog in immigration court because the applicants will not be able to pay their lawyers to help them with the merits of their asylum case. The current rule, prioritizing EADs for asylum applicants, recognizes the heavy strain that unauthorized asylum applicants

AR004090

put on the courts and their communities.

With all due respect, leave the rule where it is because there is no justification for changing it that outweighs the harm it will cause to an already vulnerable population.

AR004091

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2307

Comment Submitted by Kathy Jones

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## Submitter Information

**Name:** Kathy Jones

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## General Comment

I am writing to oppose the proposed change to USCIS's requirement to process asylum seeker's application for a work permit which would result in long delays, with no effective deadline, and leaving people who are here, living in this country, with no ability to work legally.

It is a shameful and ridiculously reasoned proposal. The applicants for Work Permits are here, in this country, in our communities. They WANT to work; they want to earn a wage, support themselves and often family members as well; to develop job skills to help them develop into contributing members of our communities and society. They would pay TAXES on the wages earned; They could access education, healthcare, etc as needed to improve themselves. They can live and work out of the shadows of "illegal" work and be visible, supervised, accountable.

Without the Permit they will have to find ways to survive: that can be anything from "illegal" work, w/ no reported income, no payment of taxes and no benefits . . . to committing crimes to survive. This proposal INCREASES the chance of people resorting to crime, becoming indigent, homeless, and ultimately both a burden and a possible threat to the communities where they live.

I understand the Administration believes this will be a deterrent to others outside the US who are thinking of coming here. that also is shameful and ridiculous reasoning!. First: it seriously hurts people who are ALREADY here and in our communities. Secondly: I know from my work in Immigration that the conditions in the countries people are leaving behind to find a better chance in the US are so much worse than here, that they will come regardless of whether they believe they can work here legally or not. Ever since the USA was "founded", people have struggled to make a living here in whatever way they can. Our government for decades encouraged people, most recently from Central America, to come here to help with our crop harvests, our needs for laborers, etc. If you think people who are so desperate they are willing to leave behind their family, their culture, their home town and country to come to a completely strange and different place to survive are going to change their mind because they are told they won't be able to work "legally", you are completely misguided about the realities of the situation and the will of human beings to do whatever is needed to survive.

AR004092

Please: DO NOT APPROVE THIS PROPOSED CHANGE! In fact, I strongly urge you to consider not only continuing the 30-day timeframe to approve a work permit, but to put your good time and energy in to finding a way to also provide Work Permits to the young, eager, energetic people who come here as Unaccompanied Minors, who apply for the Special Immigrant Juvenile Visa (SIJS) > They too, at ages 17, 18, 19 are ready to work and contribute!

thank you for your time and serious consideration of this matter. It will have huge damaging affects on our society as a whole if this proposed change goes through!

AR004093

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2308

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

While an asylum seeker is awaiting approval of their case, they are welcome in this country. They have done everything right and are seeking safety from persecution. They have looked to the United States for safety when there feels like hope exists no where else. They have looked to us for a safe future. Without the status to work, what chance have we left them? How will they rise to and thrive to the opportunity to safely work hard here and contribute to this once great nation? This proposed rule only exists to harm the United States of America- it is, un-american. It exists only to say that our promise to "your tired, your poor,/ Your huddled masses yearning to breathe" is no longer a reality of what was once known as the land of the brave.

This is not ignorance, not even negligence from our government. This is terrorism on its own people.

AR004094

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2309

Comment Submitted by Stephen Bass

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## Submitter Information

**Name:** Stephen Bass

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## General Comment

If your primary job is to protect American citizens, then why are you NOT allowing our officials DO THEIR JOBS!?!

AR004095

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2310

Comment Submitted by Damien O'Neill

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## Submitter Information

**Name:** Damien O'Neill

**Address:**

Davis, CA, 95616

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## General Comment

What exactly do we gain by delaying asylum seekers the opportunity to pursue means to support themselves? I can see no benefit to it for anyone. Asylum seekers shod be allowed to look for employment as soon as possible!

AR004096

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2311

Comment Submitted by Michael Hein, New York State Office of Temporary and Disability Assistance

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## Submitter Information

**Name:** Michael Hein

**Address:**

NYS OTDA  
40 North Pearl Street  
Albany, NY, 12243

**Email:** michael.hein@otda.ny.gov

**Phone:** 518-408-3847

**Fax:** 518-486-6255

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## General Comment

The Office of Temporary and Disability Assistance (OTDA) opposes the proposed rule change as outlined in the Department of Homeland Security (DHS) Notice of Proposed Rulemaking, Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications.

DHSs proposed changes would increase the amount of time that asylum applicants must wait in order to receive an Employment Authorization Document (EAD). The rule, if implemented, would make it far more difficult for asylum applicants to earn income while awaiting a decision on their asylum application. This additional constraint will have a detrimental impact on those individuals ability to support themselves and their families. Delaying the ability for asylum applicants to obtain employment will also impede child support collections. In addition, without a source of income, asylum applicants are likely to become homeless or to remain homeless for a longer period of time. Lastly, if asylum applicants are forced to wait for an extended period of time to receive an EAD, this could increase the likelihood of these non-citizens being victimized by perpetrators of labor trafficking.

For these reasons discussed in depth below, we urge that the proposed rule be withdrawn.

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## Attachments

OTDA - DHS Docket NO USCIS-2018-0001 - 11-8-19

AR004097



AR004098



## Office of Temporary and Disability Assistance

**ANDREW M. CUOMO**  
Governor

**MICHAEL P. HEIN**  
Commissioner

**BARBARA C. GUINN**  
Executive Deputy Commissioner

November 8, 2019

Samantha Deshommes  
Chief Regulatory Coordination Division  
Office of Policy and Strategy  
United States Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, DC 20529-2140

Re: DHS Docket No. USCIS-2018-0001

To Whom It May Concern:

The New York State Office of Temporary and Disability Assistance has reviewed the Department of Homeland Security's Notice of Proposed Rulemaking, Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications published in the Federal Register on September 9, 2019. We respectfully submit the following comments in opposition to the Proposed Rule.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Hein", with a stylized flourish at the end.

Michael P. Hein  
Commissioner

**New York State Office of Temporary and Disability Assistance**  
***Comments in Response to the U.S. Department of Homeland Security***  
***Notice of Proposed Rulemaking***

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Employment Authorization Applications Will Increase Homelessness
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  - b. Detrimental Physical and Mental Impact on Families and Individuals
- IV. Conclusion

## **I. Executive Summary**

The Office of Temporary and Disability Assistance (OTDA) opposes the proposed rule change as outlined in the Department of Homeland Security (DHS) Notice of Proposed Rulemaking, Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications.<sup>1</sup>

DHS's proposed changes would increase the amount of time that asylum applicants must wait in order to receive an Employment Authorization Document (EAD). The rule, if implemented, would make it far more difficult for asylum applicants to earn income while awaiting a decision on their asylum application. This additional constraint will have a detrimental impact on those individual's ability to support themselves and their families. Delaying the ability for asylum applicants to obtain employment will also impede child support collections. In addition, without a source of income, asylum applicants are likely to become homeless or to remain homeless for a longer period of time. Lastly, if asylum applicants are forced to wait for an extended period of time to receive an EAD, this could increase the likelihood of these non-citizens being victimized by perpetrators of labor trafficking.

For these reasons discussed in depth below, we urge that the proposed rule be withdrawn.

## **II. Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications Will Impede Child Support Collections**

OTDA supervises the child support program in New York State. State law does not limit access to child support services based on citizenship or other immigration status.<sup>2</sup> Accordingly, asylum seekers may receive child support services in New York. Any rule that creates a barrier to employment and limits a parent's ability to support a child impacts both children in intact households and children where the parents are separated. Because any delay in obtaining employment authorization could impact a parent's ability to support their child, this rule, if implemented could reduce child support collections.

## **III. Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications Will Increase Homelessness**

OTDA also oversees publicly-funded emergency shelters for homeless families with children. All publicly-funded shelters for families must be run in accordance with OTDA-approved operational plans, which must address such things as meals, nutritional standards, shelter conditions and environmental standards, and the social services that must be provided to adults and children in shelters.<sup>3</sup>

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<sup>1</sup> Docket No. USCIS-2018-0001; RIN 1615-AC19; Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, 84 Fed. Reg. 47148 (proposed Sep. 9, 2019) ("proposed rule").

<sup>2</sup> Title 6-A of Article 3 of the Social Services Law.

<sup>3</sup> 18 N.Y.C.R.R., Part 900; 18 N.Y.C.R.R. 352.39.

### **a. Increase in Individuals Accessing the Homeless Shelter System**

This rule if adopted, will delay asylum seekers from being able to obtain employment authorization. Without employment, asylum seekers will not have access to income, which will ultimately result in increases to the homeless population, especially in New York City. The rule could also affect how long asylum seekers remain homeless as the rule would likely extend the amount of time asylum applicants must wait in order to receive an EAD and start earning the income necessary to move out of shelter and in to more stable housing.

OTDA also opposes the rule because if there is an increase in asylum applicants being forced into homelessness as a result of this proposed rule, there will be increased costs for local governments. Individuals accessing homeless shelters as a result of the proposed rule will be putting additional pressure on an already strained homeless shelter system which could create significant unbudgeted costs for localities. “[T]he costs of homelessness to society can be substantial, arising from the provision of transitional shelters and community supports, emergency services, and health care. Some studies have found that the costs associated with homelessness could range from \$20,000 to \$50,000 per person per year.”<sup>4</sup> The fiscal impact on New York City will be particularly significant given the cost of housing and right to shelter.

### **b. Detrimental Physical and Mental Impact on Families and Individuals**

OTDA urges DHS to withdraw the proposed rule due to long-term detrimental impacts on children and families. Research demonstrates that children and families who experience housing instability,<sup>5</sup> especially homelessness, are at an increased risk of suffering detrimental physical and mental health effects.<sup>6</sup> The more frequent the housing instability, the greater the health risks posed to the child(ren) and caregiver(s).<sup>7</sup>

The consequences of housing instability are especially acute for children. “Housing instability has both immediate and long-term consequences for children. These consequences extend across multiple domains, including physical and mental health, learning and cognition, and academic achievement.”<sup>8</sup> One report found that children experiencing housing instability are “more than

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<sup>4</sup> See United States Housing and Urban Development, Regulatory Impact Analysis: Housing and Community Development Act of 1980: Verification of Eligible Status Proposed Rule, Dkt. No. FR-6124-P-01, p.16 (Apr. 15, 2019).

<sup>5</sup> “Housing instability” includes families who have experienced at least one of the following: 1) been behind on rent; 2) moved more than twice in the past year; 3) experienced homelessness. Megan Sandel et al., Unstable Housing and Caregiver and Child Health in Renter Families, American Academy of Pediatrics (Jan. 2018), <https://pediatrics.aappublications.org/content/141/2/e20172199>.

<sup>6</sup> See id.; MM Jones, Does Race Matter in Addressing Homelessness? A Review of the Literature, 8 World Med Health Policy 139 (June 2016), <https://onlinelibrary.wiley.com/doi/abs/10.1002/wmh3.189>.

<sup>7</sup> Id.; David R Williams, Harold W Neighbors, James S Jackson, Racial/Ethnic Discrimination and Health: Findings from Community Studies, 93 American Journal of Public Health 200 (2003).

<sup>8</sup> Kate Marcal and Patrick J. Fowler, Housing and Child Well-Being, Center for Social Development at the George Warren Brown School of Social Work, Washington University in St. Louis (Sept. 2015), [https://openscholarship.wustl.edu/cgi/viewcontent.cgi?article=1805&context=csd\\_research](https://openscholarship.wustl.edu/cgi/viewcontent.cgi?article=1805&context=csd_research).

twice as likely as others to repeat a school grade, be expelled or suspended, or drop out of high school.”<sup>9</sup>

DHS has failed to account for these long-term effects on children, families, and society in their notice of proposed rulemaking.

#### **IV. Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications Will Increase Risk of Labor Trafficking**

OTDA is authorized to enter into contracts for purposes of carrying out the State-funded Response to Human Trafficking Program (“RHTP”).<sup>10</sup> RHTP is a State program that has the purpose of assisting confirmed human trafficking victims regardless of immigration status. If an asylum applicant is confirmed as a human trafficking victim in New York State, the individual would be eligible to receive services through this program. RHTP services available to human trafficking victims include, case management, shelter assistance, medical care, mental health counseling, legal services, food, and other identified service needs.

Asylum applicants must already wait a significant period of time to receive an EAD because their application must have been pending for at least 150 days before they are even eligible to apply for an EAD. By removing the 30-day processing time period for an EAD, asylum applicants will wait even longer periods of time before receiving an EAD. Therefore, asylum applicants who are desperate to earn income may become victimized by perpetrators of labor trafficking while waiting for their EAD.

#### **V. Conclusion**

The rule, if implemented, would make it far more difficult for asylum applicants to earn income while awaiting a decision on their asylum application. The inability to earn income will, in turn, have detrimental downstream effects, including: reduced child support collections, increased homelessness, and an increased risk of these non-citizens being victimized by perpetrators of labor trafficking. Therefore, OTDA urges DHS to withdraw the proposed rule.

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<sup>9</sup> Marci McCoy-Roth, Bonnie B. Mackintosh, and David Murphey, When the Bough Breaks: The Effects of Homelessness on Young Children, Early Childhood: Child Trends (Feb. 2012), <http://www.buildinitiative.org/WhatsNew/ViewArticle/tabid/96/ArticleId/120/When-the-Bough-Breaks-The-Effects-of-Homelessness-on-Young-Children.aspx>.

<sup>10</sup> SSL Article 10-D.

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2312

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am a lawyer in private practice and my day job is doing M&A transactions. Throughout my career I have taken a number of pro bono asylum cases and helped people file for work authorization in connection with those applications.

I admittedly don't know all of the policy reasoning behind this change, but there is nothing that would justify a complete removal of a time frame to review work authorization requests. The idea of punishing an entire group because of the potential actions of a few is contrary to our system of justice.

The asylum seekers I've represented went through unfathomable treatment in their respective countries. They came here with nothing, but wanted to work. Work actually gave them a sense of self, a sense of control and a sense that they were contributing to society. The work authorization was essential to give them funds necessary to live while their case was properly pending. Without timely work authorization responses, these people would actually become a drain on our community resources. It is not going to stop them from coming. Most of the time, they don't even understand asylum at all in the first place, let alone appreciate some technicality. Life is so terrible for them, or they fear for their life in such a way that anything is better.

This administration needs a reminder that other than Native Americans, we are all immigrants here. Let's treat people with the human dignity and respect that they deserve. For those strong, Christian religious convictions, if you ask yourself, what would Jesus do, he certainly would not treat anyone the way this administration is treating immigrants and asylum seekers to this country.

This policy change should not be enacted as is. If USCIS needs more time to process, change when someone can file for work authorization, for example, currently you must wait until 150 days after your application is pending, then USCIS has 30 days to respond. Change it to file 120 days and give USCIS 60 days to respond. There are logical steps here to benefit both sides.

AR004104

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2313

Comment Submitted by Rachael Toll

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## Submitter Information

**Name:** Rachael Toll

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## General Comment

I feel strongly that asylum seekers deserve the right to obtain a lawful work permit within 30 days after applying. Changing the current 30 day regulation to a six month or more waiting period will very negatively impact already vulnerable and marginalized people, and will also negatively impact the US and our economy. Asylum seekers come to the United states fleeing violence and persecution, often with little to no money, and live in limbo, lawfully applying for status, but barely scrapping by to pay for rent or food. Restricting their right to work lawfully is not beneficial to anyone, and USCIS itself states that it could cost the government over \$38 million dollars a year in lost tax revenue because people will not be able to enter the work force and they and their employers will therefore not be paying taxes.

AR004105



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2314

Comment Submitted by Irena Tsoustas

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## Submitter Information

**Name:** Irena Tsoustas

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## General Comment

Asylum-seekers not working just adds an additional burden to the state. Let them work and be taxed like the rest of us!

AR004106

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2315

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Immigrants are less likely to commit crimes and more likely to be productive members of our society, and they deserve a chance to earn a living while they wait for our overburdened asylum system to provide a ruling.

AR004107

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2316

Comment Submitted by Ron Russell

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## Submitter Information

**Name:** Ron Russell

**Address:**

1627 Cowling Ave.

Louisville, 40205

**Email:** rrussell@russellimlaw.com

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## General Comment

I am a retired immigration attorney who has filed many asylum applications over the years on behalf of those fleeing serious harm and/or likely death from their persecutors. The right to timely obtain employment authorization was vital to these individuals ability to pursue their asylum case. A quickly obtained EAD allowed securing an income to pay for daily needs such as food, shelter, and other necessities, without which they and their family needed to survive.

When I first began practicing immigration law years ago an asylum applicant could immediately file for an EAD once the asylum application was filed. That time frame allowed an asylum seeker to quickly support themselves and their families. A change was made to force an applicant to wait 150 to file an EAD because some felt it encouraged frivolous asylum filings. I disagreed because of the hardship it imposed on asylum seekers who needed the ability to work upon entry.

If this proposed rule change were allowed it would make obtaining an EAD a mere possibility at some uncertain time in the future, undercutting a person's ability to remain in this country to pursue their asylum claim. It would likely either force them to return to their country of persecution, or give up on their claim because they could not afford to pay the cost associated with filing, attorney fees, and paying for everyday living expenses.

Another result of the change would force asylum seekers to begin work, without authorization, from an unscrupulous employer who could super exploit this most vulnerable worker. The proposed change would strongly undercut our nation's commitment to assist those fleeing persecution, placing upon them a hardship that would exacerbate the trauma they fled from in their home country.

AR004108

So I strongly support maintaining the 30 day time frame for processing an EAD for asylum seekers. If the USCIS has a lack of resources for processing within 30 days, then allow asylum seekers to file for an EAD within 120 days of submission of the asylum application and require a 60 processing time of the EAD.

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2317

Comment Submitted by Kelley Chenhalls

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## Submitter Information

**Name:** Kelley Chenhalls

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## General Comment

Dear Sir/Madam,

I am an immigration attorney who has represented hundreds of immigrants through the years and based on my knowledge and experience with our complicated immigration system, I want to provide a comment to the proposed rule to remove the 30-day processing for asylum applicants' I-765 applications.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCIS's goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

Furthermore, USCIS also admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge - which is completely contrary to the

AR004110

intentions of the current administration.

For these reasons, I urge the government NOT to remove the 30-day I-765 processing timeline for asylum seekers.

Thank you.

AR004111

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2318

Comment Submitted by Linette Tobin

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## Submitter Information

**Name:** Linette Tobin

**Address:**

3422 Newton St

Mount Rainier, MD, 20712

**Email:** linette@linettetobin.com

**Phone:** 3018647839

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## General Comment

Asylum seekers and other displaced persons are arguably the most vulnerable & traumatized people in the world. If the U.S. asylum system cannot process asylum applications quickly, the asylum seekers need to be allowed the dignity to work and regain their self-sufficiency and self-respect.

I have practiced immigration law for 25 years, and can say with all confidence that asylum seekers do NOT want to be a drain on the system. They want to enter society and work hard to provide for their families.

Please do not remove the 30-day processing time frame for EADs/work permits.

AR004112

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2319

Comment Submitted by Hollis Hill

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## Submitter Information

**Name:** Hollis Hill

**Address:**

1227 41st Ave.E.

Seattle, WA, 98112

**Email:** hrh@hollisrhill.com

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## General Comment

I oppose this rule change. Asylum seekers have to work just like everyone else. Otherwise, how will they eat? Shall we let them starve while they are seeking safety? How cruel can we be?

AR004113



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2320

Comment Submitted by Rachel Mendoza-Newton

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## Submitter Information

**Name:** Rachel Mendoza-Newton

**Address:**

7812 Raintree Dr Apt 106

Louisville, KY, 40220

**Email:** raquelita\_abogada@yahoo.com

**Phone:** 5023866545

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## General Comment

I am writing to OPPOSE removing the 30 day deadline for approval of work permits for asylum seekers. Everyone has the right to request asylum if they feel their lives and safety are in danger, and instead of trying to dissuade them from seeking asylum by making their lives miserable, we should be making the process smooth and efficient and less burdensome for all involved (including US).

While waiting for their cases to be processed, asylum-seekers still need food, a place to live, clothing, electricity, etc. It doesn't make sense to burden the taxpayers with paying for those things in the form of pointless and unnecessarily punitive incarceration. It makes a lot more sense to give them permission to work as soon as possible and allow them to support themselves while contributing to the economy. The more they work, the more it benefits all of us!

Dragging out the process any longer than absolutely necessary can lead to terrible results. The asylum seeker may lose their housing, lose their job, and go without food. They won't be able to get a social security number, which means they can't get a valid ID or driver license in most states (including KY where I live). They can't get health insurance, either. They might end up homeless. They will be very vulnerable to exploitation, which is already a serious problem. Many people fleeing for their lives are already traumatized, and suffer from depression, anxiety, and PTSD, among other mental health issues. Employment helps with those, and jobs that allow the worker to get insurance are even better.

The more people work, the more taxes people pay, too. I can't understand why the government would WANT people to be a burden on the taxpayers instead of BEING taxpayers! USCIS has already admitted that ALL levels

AR004114

of government will lose a lot of money due to this change, and USCIS alone will lose \$39-\$118 MILLION/year!!

I understand that USCIS would like to have more than 30 days to decide the cases, even though USCIS acknowledged that it decided over 99% of work permit applications by the 30-day deadline in the last year. Asylum-seekers' work permit applications can't be approved before 180 days after filing for asylum anyway, so the real solution for this is obvious - just let everyone submit their applications sooner (like after 90 days or 120 days) and then USCIS can have the remainder of the 180 days to make its decision.

Since there is such an obvious solution available, this proposed change makes me suspect that the reasons given for wanting the change are not the true ones. A lot of changes have taken effect over the last 2 1/2 years in various aspects of the asylum seeking process. Each and every one of them has been an effort to make the process MUCH harder - to go through and to win. This trend is VERY disappointing. I was raised to respect and honor our nation's ideals of equality and freedom, and to be proud of the shining example we set for other countries. This administration has turned its back on all of that, and I have never been so ashamed of my government.

AR004115

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2321

Comment Submitted by Janice Dysinger

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## Submitter Information

**Name:** Janice Dysinger

**Address:**

Gresham, OR, 97080

**Email:** JANICE@DYSINGER.INFO

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## General Comment

I support this rule change.

Please extend the current 30 day requirement to indefinite time frame. We need time to vet the people who are coming into our country. It is a matter of safety. Our process of immigrations must be thoughtful and consistent. Those waiting and following the rules must take precedence over those who just show up and expect to jump in front of the line.

AR004116

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2322

Comment Submitted by Maria M

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## Submitter Information

**Name:** Maria M

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## General Comment

As an immigration practitioner in NYC, I am completely against this proposed rule because it will have lasting consequences for asylum seekers in our city and the entire country. By removing the 30 day deadline, there is no incentive for USCIS to adjudicate employment authorization applications in a timely manner. Asylum seekers would not be authorized to work for longer periods of time which would inevitably result in financial hardships such as no income to pay for housing, food, and other basic needs. Asylum seekers would not be able to receive medical insurance and would not have access to service agencies that support asylum seekers to adjust to a new and safe lives in the United States. This rule would have drastic consequences for people seeking protection from the United States and would, instead, prevent them from working and providing for themselves and their families. There is no valid reason for this rule, and there are other options available should USCIS decide they need more time to adjudicate applications - for example, they could allow asylum seekers to apply for work authorization after 120 days of filing their asylum application; that way, USCIS would have 60 days to adjudicate work authorization applications. I am strongly opposed to this proposed rule and urge you to seek better solutions that wouldnt prejudice people seeking asylum in this country.

AR004117

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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2323

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Both my parents are immigrants. My dad worked as a cook, and my mom worked in retail. Both are hard-working, often working 6-7 days a week, and contributed more than their fair share to the US economy and tax system. They came into the US in the 50s and 60s, based on policies that no longer exist (both of them had uncles that sponsored them, which is no longer a path). In general, it's infuriating the path general US immigration policy is heading, and this proposed rule is another example.

First and foremost, all accepted data (as opposed to nonsense opinions) indicate we as country, will lose money. The United States Customs and Immigration Service (USCIS) issued a report that approximately \$40M to \$119M in tax revenue would be lost annually.

Secondly, it's just cruel, and frankly, un-American. Why would we needlessly put people seeking asylum, who are already fleeing situations of rape, violence, and family members being murdered, in addition to children being exposed to all of the above, and force them into what would result in an even more inhumane experience, with their children to boot? There's a complete lack of human empathy that is just shameful.

Also, is there any evidence that application processing hasn't been able to complete within a 30-day period of any significance? Without any credited data justification, it only makes sense to prevent this removal from moving forward until further data can be collected.

AR004118

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2324

Comment Submitted by Laura Brown

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## Submitter Information

**Name:** Laura Brown

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## General Comment

I have had the pleasure to work with many asylum seekers over the last seven years, both as my clients and my colleagues. The asylum process in the US is complicated, slow and expensive (while the government doesn't charge fees, asylum attorneys do). Most asylum seekers are eager to start their lives in the US- to find a job in order to secure housing and avoid becoming dependent on the government. Under the proposed rule, asylum seekers would lose wages because of their delayed entry into the U.S. labor force, making it difficult to support themselves. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause tremendous harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Without employment authorization, asylum seekers won't be able to obtain an ID and will consequently be increasingly vulnerable to exploitation, trafficking, and underground economic risks.

Not only will the proposed changes negatively impact these individuals, it will also hurt the US economy. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

I strongly oppose the proposed rule for these reasons, and ask USCIS to reconsider their decision.

AR004119

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2325

Comment Submitted by Tatiana Arce

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## Submitter Information

**Name:** Tatiana Arce

**Address:**

113 PADDOCK CIRCLE  
MASHPEE, MA, 02649

**Email:** karenaguinn@me.com

**Submitter's Representative:** kg

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## General Comment

Asylum seekers are seeking protection from tremendous persecution in their countries of origin. It is important for them to provide for themselves and their family members. This government criticizes immigrants for wanting to take everything free from it yet it wants to limit the mechanism that asylum seekers have to provide for themselves and not to depend on the government.

AR004120

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2326

Comment Submitted by Nicolle Walker

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## Submitter Information

**Name:** Nicolle Walker

**Address:**

902 W. Glendale Ave. #203

Phoenix, AZ, 85021

**Email:** guatechick78@yahoo.com

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## General Comment

I work with migrants on a daily basis. In my experience, one of the most significant areas of further trauma and stress for a migrant is the inability to work and provide for their families. If this rule is implemented, asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. This could lead asylum seekers to work "under the table" and in fields that could lead to increased chances of exploitation and human trafficking.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. USCIS could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

AR004121



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2327

Comment Submitted by Jeremy L. Neufeld, Niskanen Center

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## Submitter Information

**Name:** Jeremy L. Neufeld

**Address:**

820 First Street, NE, Suite 675

Washington, MD, 20002

**Email:** jneufeld@niskanencenter.org

**Phone:** 2406449782

**Organization:** Niskanen Center

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## General Comment

Comment Submitted by Jeremy L. Neufeld, Niskanen Center

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## Attachments

Comments submitted by Jeremy L. Neufeld, Niskanen Center

AR004122



## Regulatory Comment

*Comments submitted to the Department of Homeland Security, in the Matter of:*

# Removal of 30-Day Processing Provision for Asylum Applicant-Related EAD Applications

84 FR 47148

Jeremy L. Neufeld  
Immigration Policy Analyst  
Niskanen Center

Submitted: November 8, 2019  
Docket Number: USBC-2018-0005

## Introduction

The Department of Homeland Security (DHS) proposes removing the regulatory provision which states that U.S. Citizenship and Immigration Services (USCIS) has 30 days to grant or deny an initial employment authorization application (EAD application) from the date an asylum applicant files the initial Form I-765. The stated purpose of the removal is to provide USCIS with sufficient time to process EAD applications.

The Niskanen Center believes removing the rule altogether, especially without a replacement, imposes unacceptable costs that dwarf the purported benefits.

This comment first describe why DHS's cost estimates, as large as they are, are *underestimates*. Further, it makes conservative adjustments to derive more realistic, though still low, estimates. The comments conclude with alternatives to consider that would better manage the costs.

## I. The costs associated with removing the 30-day processing provision are higher than DHS estimates

DHS's own estimate of lost compensation from removing the provision is between \$256 million and \$775 million annually—with the associated ten-year cost estimated to be somewhere between \$1.797 billion (lower bound wage rate and a high discount rate) to \$6.609 billion (upper bound wage rate and low discount rate). Further, DHS estimates an associated (annual) loss to the federal government of \$39 million to \$119 million in tax revenue.<sup>1</sup> DHS grants that the rule would have no effect on wages,<sup>2</sup> which implies that *even if businesses were able to find replacement labor*, they would be shifting workers from elsewhere in the labor force rather than inducing people to shift away from leisure. It follows that the rule is expected to shrink real output. The costs therefore approximately represent the total economic cost, and not merely transfers.

Such sizeable costs would be concerning enough, but to make matters worse, they are systematic underestimates. Any estimation requires simplifying assumptions, but DHS makes major assumptions that significantly bias the cost estimates downward.

Before criticizing the biased assumptions, we commend the assumptions regarding the lower and upper bounds on asylee wage rates. Data is not directly available on the earnings of asylum applicants, and DHS therefore had to determine reasonable lower and upper bounds. It decided on using the federal minimum wage and the average national wage respectively. We test how well these bounds capture the earnings of asylees by seeing how well they would have predicted the earnings of asylees in the past, when we did have more direct data. We find that DHS's choice of bounds is unbiased and fairly precise.

The New Immigrant Survey (NIS), which, while it does not have data for recent years, has the benefit of explicitly breaking down data by immigration category. Notably, it can be used to see the earnings and wage rates of refugees and asylees in the 12 months prior to their gaining LPR status. The NIS reveals the actual average wage rate among refugees and asylees was \$10.60, using the wage rates of respondents at the time of the survey.<sup>3</sup> Likewise, the survey reports the average earnings among refugees and asylees in the prior 12 months was \$22,236, which, assuming 2,080 annual hours worked, comes out to \$10.69.<sup>4</sup> At the time of the NIS (i.e., 2003), the federal minimum wage was \$5.15<sup>5</sup> and the average hourly earnings nationally was \$15.30.<sup>6</sup> Using those as the lower and upper bounds as DHS does, the midpoint between the two is \$10.22, within 5 percent of the

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<sup>1</sup> Federal Register. Department of Homeland Security. Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications, 84 Fed. Reg. 47148 (proposed September 9, 2019) (to be codified at 8 C.F.R. pt. 208), at 47150.

<sup>2</sup> *Id.* at 47153.

<sup>3</sup> Author's calculations, using Jasso, Guillermina, Douglas S. Massey, Mark R. Rosenzweig and James P. Smith. "The New Immigrant Survey 2003 Round 1 (NIS-2003-1) Public Release Data." March 2006. Funded by NIH HD33843, NSF, USCIS, ASPE & Pew. <http://nis.princeton.edu>.

<sup>4</sup> *Id.*

<sup>5</sup> U.S. Department of Labor, "History of Federal Minimum Wage Rates Under the Fair Labor Standards Act, 1939-2009," <https://www.dol.gov/whd/minwage/chart.htm>.

<sup>6</sup> Bureau of Labor Statistics, "Monthly Labor Review, November 2003," Table 14. "Average hourly earnings of production or nonsupervisory workers on private nonfarm payrolls, by industry, monthly data seasonally adjusted." <https://www.bls.gov/opub/mlr/2003/11/clso311.pdf>

actual result indicated by the NIS. This indicates that DHS's choice of upper and lower bounds for wage rates is reliable.

However, DHS makes dubious assumptions that cause its final estimates to be significantly lower than what the costs would actually be:

**A. DHS assumes that asylum applicants' earnings are constant and unaffected by delays in work authorization.**

DHS calculates the cost of lost compensation by multiplying a constant wage rate by the projected length of the delay. However, this fails to account for the trajectory of future earnings. Asylum seekers' wage rates do not remain constant while they work, but rise the longer they have been in the work force. The NIS included a follow-up survey repeating the same questions about income and employment to respondents four to five years after they originally answered the survey as new asylees. The NIS data show that refugees and asylees saw very fast wage growth as they integrated into the economy. On average, refugees and asylees saw compound annual growth rates of 16 percent in their earnings and 11 percent in their wage rates.<sup>7</sup>

Further, DHS treats the earnings of pending asylum applicants as unrelated to the length of the delay before they have work authorization. However, long-term economic integration can be severely slowed by relatively short delays. A study out of the Immigration Policy Lab at Stanford University on German asylum-seekers, for instance, found that a seven month delay in work authorization for asylum-seekers had persistent effects, dragging down the economic outcomes of those who had to wait longer for work authorization for a decade. The authors summarized their paper saying that "our findings suggest that longer employment bans considerably slowed down the economic integration of refugees and reduced their motivation to integrate early on after arrival."<sup>8</sup> Notably, they found that income among those asylum seekers who faced shorter delays was about 27% higher.<sup>9</sup>

DHS's ten year cost estimates are therefore inadequate since they only consider foregone compensation while EADs are being processed and ignore the significant long term effects of delays on the labor market outcomes of pending applicants with work authorization and of those approved for asylum.

**B. DHS assumes that without the provision, processing times will resemble those in FY2017.**

DHS cites the historic asylum application backlog for the overall increase in pending asylum applications<sup>10</sup> While an asylum application is pending, the applicant may file an initial EAD application and renew the initial EAD until their asylum application is adjudicated.<sup>11</sup> Using FY 2017 as a baseline, in which 78 percent of initial

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<sup>7</sup> Author's calculations, using Jasso, Guillermina, Douglas S. Massey, Mark R. Rosenzweig and James P. Smith. "The New Immigrant Survey 2003 Round 2 (NIS-2003-2) Public Release Data." April 2014. Funded by NIH HD33843, NSF, USCIS, ASPE & Pew. <http://nis.princeton.edu>.

<sup>8</sup> Marbach, Moritz, Jens Hainmueller, and Dominik Hangartner. "The Long-Term Impact of Employment Bans on the Economic Integration of Refugees." *Science Advances* 4, no. 9 (September 2018): eaap9519. <https://doi.org/10.1126/sciadv.aap9519>.

<sup>9</sup> *Id.*

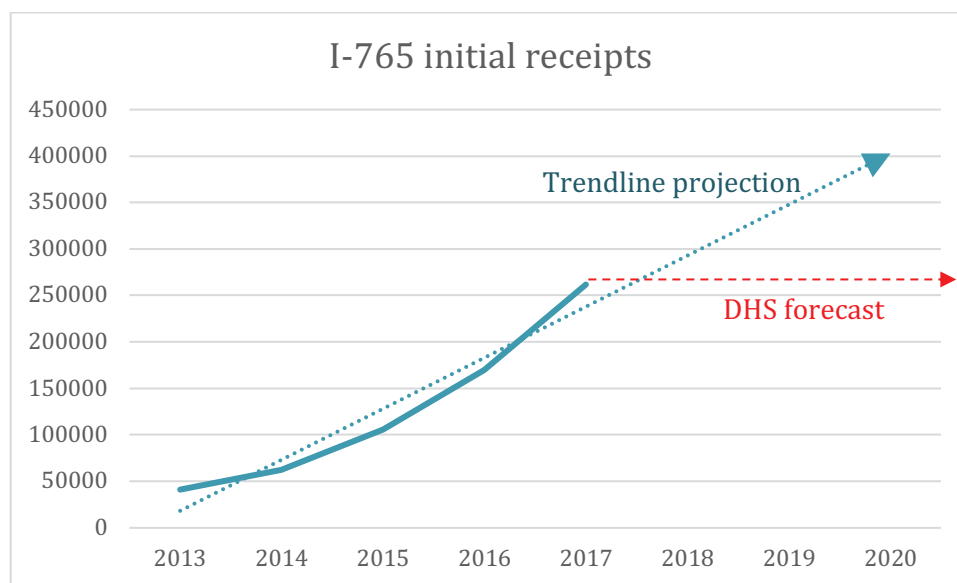
<sup>10</sup> FR, DHS, Removal.

<sup>11</sup> *Id.* at 47153.

EAD applications were adjudicated within 60 days of the original filing date, DHS asserts that if the proposed rule were to go into effect, those numbers would be sustained.<sup>12</sup> While we do not doubt DHS's intention to maintain 2017 level processing times, especially in the short-run, without any regulatory guidance constraining processing times, future obligations may necessitate making tradeoffs at the expense of purely discretionary processing goals, which would then include EAD application processing times.

**C. DHS assumes that the number of I-765 receipts will indefinitely resemble 2017.**

DHS explicitly considered using “a trendline to forecast future projected applications” but decided against it, reasoning that “various factors outside of this rulemaking” lead to too much uncertainty.<sup>13</sup> If anything, uncertainty should have prompted the use of a range of estimates, as DHS did with earnings, rather than the use of a single point estimate that rests on applications remaining level.



Source: DHS

While claiming that the level of applications is something that “USCIS cannot predict,” DHS nevertheless *did* make a prediction by merely adopting the 2017 level. However, in spite of uncertainty, we believe a trendline forecast is better than using one year’s level as a default prediction.

<sup>12</sup> *Id.* at 47149.

<sup>13</sup> *Id.* at 47162.

## II. Toward a more accurate estimate of cost

Recognizing the limitations of the original assumptions, we can make adjustments to the cost model to arrive at more accurate estimates. Cost estimates can be seen in the table below.

### Ten-year cost estimates of proposed rule

Wage designation:			Lower bound		Upper bound	
Discount rate:			3%	7%	3%	7%
DHS estimates:			\$2.183 b	\$1.797 b	\$6.609 b	\$5.442 b
Processing time increased by <sup>14</sup>	Initial receipts growing <sup>15</sup>	Delay effect on wages <sup>16</sup>				
5%	Linearly	1%	\$10.002 b	\$7.964 b	\$30.283 b	\$24.113 b
		5%	\$21.484 b	\$17.467 b	\$65.050 b	\$52.887 b
	Asymptotically	1%	\$4.288 b	\$3.570 b	\$12.985 b	\$10.808 b
		5%	\$9.983 b	\$8.469 b	\$30.228 b	\$25.643 b
10%	Linearly	1%	\$10.759 b	\$8.557 b	\$32.577 b	\$25.910 b
		5%	\$22.489 b	\$18.255 b	\$68.095 b	\$55.274 b
	Asymptotically	1%	\$4.593 b	\$3.819 b	\$13.906 b	\$11.563 b
		5%	\$10.387 b	\$18.255 b	\$31.452 b	\$26.644 b

None of these new estimates is strongly preferred to any other, and indeed, they are still likely conservative, since they neither fully capture the wage effects of delayed work authorization nor the dynamics of how processing times react to increases in initial receipts. In any case, they illustrate how reliant the original low estimates were on the assumptions that produced them.

<sup>14</sup> In 2017, USCIS completed 119,088 cases past the deadline. On average, it took 31 days beyond the deadline (i.e., 61 days in total) to complete one of those cases. The total number of calendar days processing applications past the deadline was 3,651,326. Adjusting for slower processing speeds was simply a matter of scaling the total number of calendar days by 1.05 or 1.1.

<sup>15</sup> We take year one to begin with 119,088 adjudicated cases. In the linear trend cases, each year, we increase the number of adjudicated cases by 54,932 (the fitted slope of the trendline), but only consider costs for the 53% of them we assume take longer than 30 days. For simplicity, even with slower processing, we assume a constant proportion of total adjudicated cases that take longer than 30 days. In the “slowing down” cases, the marginal increase begins at 54,932 but is halved every year.

<sup>16</sup> Relying on data from TRAC Immigration, “Immigration Court Processing Time by Outcome, by Removals, Voluntary Departures, Terminations, Relief, Administrative Closures,” September 2019, and estimating over the last five years, we estimate that 9.9% of asylum applicants will successfully get asylum and that the average time it takes to complete a case is 542 days. We then calculate the net present value of the earnings an asylum applicant would have received in the absence of delays, assuming that the delay length is above 31 days by the amount indicated in the first column, that their earnings would be reduced by the “delay effect” given, that those who get asylum continue to earn until the end of the ten year period, and that those who do not get asylum leave after 542 days.

## Conclusion

Accounting for wage growth over time, the effects of delays on economic integration, the likelihood of slower processing, and the likelihood of increased asylum applications all point to higher costs than originally supposed. The original estimates were by no means trivial, but the true cost of this proposed rule is likely many times higher than in published estimates. In addition, no estimates of the benefits have been produced, nor has there been any comparison to the costs of alternative solutions like additional staffing.

Because even short delays can have persistent negative consequences on economic integration, removing all provisions on the length of adjudication is very costly. Even a 90 day deadline raises concerns about the long-term effects on those asylum applicants who will become Americans. A 60 day window should be considered, even if DHS has taken longer with some applications in 2017 (though it was able to return most within 60 days). 60 days recognizes the need for some flexibility to address other DHS priorities, as well as the increased asylum backlog. In addition, conditioning the length of the deadline on objective and reportable metrics may also offer a middle ground.

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2328

Comment Submitted by William Snead

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## Submitter Information

**Name:** William Snead

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## General Comment

Please comply with your Commander and Chief and lock down the border end Sanctuary areas and comply with Federal laws or go to jail before Real Justice ends up being old Western Justice!

AR004129



# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2329

Comment Submitted by Eileen Morrison

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## Submitter Information

**Name:** Eileen Morrison

**Address:**

31 Gay St.

Newtonville, 02460

**Email:** emorrison@morrisonlaw.us

**Phone:** 617-5627-4475

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## General Comment

USCIS-2018-0001. The proposed rule is appalling. Eliminating the 30-dayp processing deadline will work a substantial hardship to the applicants, who have arrived in the United States fleeing violence and oppression in their home country. They are eager to begin the next chapter of their lives and get to work. Applicants for asylum fill a number of vital jobs including child care, elder care, restaurant work, parking garages, food preparation, customer service. In Massachusetts, our most recently unemployment statistic reflect a 2.9% unemployment rate. US-wide, the unemployment rate is 3.6%. To throw a traumatized group of people into further difficulty by eliminating the 30-day processing deadline is unnecessary and barbaric and greatly detrimental to asylum seekers and their families as they try to rebuild their lives in safety in the US. It works an unconscionable hardship to the US companies seeking ot hire these workers, who are straining to fill jobs in a time of very low unemployment. I

AR004130

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2330

Comment Submitted by Alberto Enriquez

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## Submitter Information

**Name:** Alberto Enriquez

**Address:**

2316 Hillcrest Road  
Medford, OR, 97504

**Phone:** 541-770-1484

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## General Comment

My wife and I are retirees living in Medford, Oregon. We strongly oppose this rash, mean-spirited and destructive rule change.

During the recently completed grape harvest so important to our area, we and about 20 others volunteered to save a friend's crop by picking the late season cabernet sauvignon. There simply weren't enough paid pickers available in our area and the crop would have gone to rot.

The United States is the largest economy in the world, and we have had steadily declining unemployment since October 2009, just 10 months after President Obama took office in the face of the stock market and mortgage crises. Neither of those crises were triggered by immigration. Rather, they were caused by the deliberate malfeasance of some of the richest people in this country, who structured mortgage loans that were designed to fail, and further repackaged those loans as investments not backed by the FDIC or any other federal backstop

First off, our economy did not stumble in 2008 because of immigrants, but by the design of people like the infamous real estate fraud Donald Trump and the scheming investment banker Steven Mnuchin, now incredibly and respectively, our president and treasury secretary. Small wonder that those at the top who profited by so much American misery must now search for scapegoats and demonize those at the bottom!

Secondly, looking back on our 10-year recovery, we can see which areas recovered quickest and strongest. Here are some well established facts about the areas that received the most immigrants:

AR004131

Immigrants created jobs.

Immigrants lowered the crime rate.

Immigrants helped keep America young.

In fact, by these measures, immigrants did exactly the opposite of what that constant liar Trump says about them. They helped make America stronger!

We are unique among nations in the world because we are going through the demographic transition smoothly. Even Mexico and South Africa are seeing their populations age more rapidly! Why? Because immigrants as a class are drawn from the younger, more capable and critically throughout our nations history the more entrepreneurial people of their home nations.

This proposed rule change would cut off our nose to spite our face. Why? Because of an evil president who can only hope to maintain his place by constantly raking up ill will and poisoning the minds of many. There is no good reason why people who are legally seeking asylum in the United States should not be kept busy by seeking gainful employment. That's good for them and good for the USA. Furthermore, irrespective of this particular rule change, families should always be kept together. This rule change would make that more difficult. Throughout history the USA has done some great things and also some terrible things, including slavery and the genocide of indigenous people. This president has taken us back to those horrors, by endorsing the kidnapping and torture of other peoples children. Stop!

Whatsoever we do to the least of Gods children, we will ultimately be held accountable for. In recent years, we've seen desperate people turned away despite credible fears of persecution and murder, only to learn that they were in fact, later murdered. We can and must do better.

# PUBLIC SUBMISSION

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<b>Submission Type:</b> API

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2331

Comment Submitted by Parmjeet Botterill

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## Submitter Information

**Name:** Parmjeet Botterill

**Address:**

391 Sutter Street, Suite 208  
San Francisco, CA, 94108

**Email:** pkrlaw@yahoo.com

**Phone:** 4156599238

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## General Comment

Do not remove the 30-Day Processing Provision for Asylum Applicant's EADs. Asylum applicants have a right to work. They are often fleeing immediate persecution, without the ability to pack essentials and valuables to bring with them. They often have to forsake any savings they may have in their home country. They arrive with nothin, having to leave everything behind. If they are willing and able to work, they should be allowed to do so. Being able to support themselves is important to their physical, financial, mental and emotional well-being.

AR004133

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2332

Comment Submitted by Jacklyn I. Gurany, Children's Law Center of Massachusetts

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

See attached file(s)

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## Attachments

Public Comment on EAD processing for asylum applicants 11.8.19

AR004134

November 8, 2019

*Submitted via Federal e-Rulemaking Portal*

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
20 Massachusetts Ave. NW  
Washington, D.C. 20529

**RE: Opposition to Proposed Federal Rule “Removal of 30-day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications,” DHS Docket No. USCIS-2018-0001**

Dear Ms. Deshommes:

The Children’s Law Center of Massachusetts submits this comment opposing the proposed regulations relating to the removal of the 30-day processing provision for employment authorization applicants with pending asylum applications. The Children’s Law Center, a Boston-area nonprofit organization, provides pro bono legal services to children and youth from diverse backgrounds in a variety of legal areas including education, immigration, mental health, and child welfare matters. Our immigration attorneys represent children and youth who are eligible for humanitarian immigration relief due to abuse, trauma, and persecution they have suffered in their home countries. Typically, our clients include youth who have arrived in the United States as unaccompanied immigrant children. A number of our clients are in state foster care. All of them are low-income.

The proposed revision relating to the removal of the 30-day processing provision for asylum-seekers applying for work authorization would have a significant negative impact on our immigrant child clients who are applying for humanitarian protection and attendant immigration benefits. Specifically, the revision will have long-lasting effects on the ability of our asylum-seeking clients to support themselves and their families while they wait for their asylum claims to be adjudicated. Many of these clients have been waiting months or years for their asylum applications to be heard. The proposed revision would thus severely limit our clients’ ability to be self-sufficient during these long wait times.

Further, the proposed revision would have a similar negative impact on the local and national economy, both of which benefit greatly from the labor contributions of asylum-seekers and immigrant communities. The current rule already requires a lengthy 180-day waiting period before an applicant for asylum may submit an application for an employment authorization document. It is therefore unnecessary to extend the time period applicants must wait in order to receive work authorization.

The Children’s Law Center is deeply concerned that without the 30-day processing requirement for employment authorization for asylum-seekers, our clients and others similarly situated will

AR004135

lack the ability to support themselves and their families. Further, without an employment authorization document--which for many of our clients is their only form of government-issued identification--their ability to access additional services and to fully integrate into the community will also be considerably diminished. Our clients and other asylum-seekers have the right to seek safety and protection in the United States from the harm they have suffered in their countries of origin, and the same statutes and regulations provide for the right to seek employment authorization while their asylum claims are pending. Because the proposed revision places a serious burden on the most vulnerable immigrant children and youth, we strongly oppose the proposed regulation and request that it be withdrawn.

We respectfully request that USCIS continue to process employment authorization applications for those with pending asylum claims pursuant to the current policy that requires adjudication within 30 days of filing.

Thank you.

Very truly yours,

Jacklyn I. Gurany  
Staff Attorney  
Children's Law Center of Massachusetts

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2333

Comment Submitted by Dean Petitta

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## Submitter Information

**Name:** Dean Petitta

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## General Comment

At the end of January, the US economy had 7.6 million unfilled jobs, but only 6.5 million people were looking for work. For one of the first times in recent American memory, we have a labor shortage.

Permitting employment authorizations for those awaiting asylum adjudication can help solve this market failure. But it will all be for naught if USCIS isn't bound to adjudicate asylees' employment authorization requests in a timely fashion. USCIS has the power to stabilize the American economy by injecting a much-needed supply of labor into the market. It should not be allowed indeterminate discretion to restrict the American labor supply--especially in a time when we are facing such great need.

Furthermore, forcing individuals fleeing violence to wait indeterminate amounts of time before they are allowed to work will cause further strain on public services and convert willing and able workers into public charges. This is a strong policy conflict with the recent public charge rules recently promulgated by USCIS. Asylees should be permitted to support themselves and contribute to the economy instead of being forced to turn to public assistance for support.

This proposed rule should be rejected because it is irrational, harmful, and incompatible with existing policy goals.

AR004137



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2334

Comment Submitted by Kate Jastram, Center for Gender & Refugee Studies

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## Submitter Information

**Name:** Kate Jastram

**Submitter's Representative:** Kate Jastram

**Organization:** Center for Gender & Refugee Studies

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## General Comment

See attached file(s)

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## Attachments

Asylum EAD 30 day rule 2019.11.8 FINAL

AR004138

CENTER FOR  
**Gender & Refugee**  
STUDIES

*Protecting Refugees • Advancing Human Rights*

November 8, 2019

Via Federal e-Rulemaking Portal

<https://www.regulations.gov/docket?D=USCIS-2018-0001>

Samantha Deshommes  
Chief, Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
20 Massachusetts Avenue NW, Mailstop #2140  
Washington, DC 20529-2140

RE: Request for Comments on Removal of 30-Day Processing Provision  
for Asylum Applicant-Related Form I-765 Employment Authorization Applications (Sept. 9, 2019)  
DHS Docket No. USCIS-2018-0001

Dear Ms. Deshommes,

The Center for Gender & Refugee Studies (CGRS) writes in response to DHS Docket No. USCIS-2018-0001, the U.S. Citizenship and Immigration Services (USCIS) Request for Comments on Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications (September 9, 2019) (hereinafter, the Rule).

CGRS was founded in 1999 by Karen Musalo following her groundbreaking legal victory in *Matter of Kasinga*<sup>1</sup> to meet the needs of asylum seekers fleeing gender-based violence. CGRS protects the fundamental human rights of refugee women, children, LGBTQ individuals, and others who flee persecution and torture in their home countries. CGRS is an internationally respected resource for gender asylum, renowned for our knowledge of the law and ability to combine sophisticated legal strategies with policy advocacy and human rights interventions. We take the lead on emerging issues, participate as co-counsel or *amicus curiae* in impact litigation to advance the rights of asylum seekers,<sup>2</sup> produce an extensive library of litigation support materials, maintain an unsurpassed database of asylum records and decisions, and work in coalitions with immigrant, refugee, LGBTQ, children's, and women's rights networks. Since our founding, we have also engaged in international human rights work to address the underlying causes of forced migration that produce refugees - namely, violence and persecution committed with impunity when governments fail to protect their citizens.

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<sup>1</sup> 21 I&N Dec. 357 (BIA 1996).

<sup>2</sup> See, e.g., *Innovation Law Lab v. McAleenan*, 924 F.3d 503 (9th Cir. 2019); No.3:19-cv-00807-RS (N.D. Cal.) (pending); *Damus v. McAleenan*; No. 1:18-cv-00578-JEB (D.D.C.) (pending); see also *Damus v. Nielsen*, No. 18-578, 313 F.Supp.3d 317 (D.D.C. Jul. 2, 2018); *Grace v. Barr*, 344 F.Supp.3d 96 (D.D.C. Dec. 18, 2018) (gov't appealed), No. 195013 (D.C. Cir. Jan. 30, 2019)); and *Matter of A-B*, 27 I&N Dec. 316 (A.G. 2018).

As a critical part of our mission, CGRS educates decision makers to promote laws and public policies that recognize the legitimate asylum claims of those fleeing persecution, with a special focus on women, children and LGBTQ refugees. Our goal is to create a U.S. framework of law and policy that responds to the rights of these groups and aligns with international law.

For the following reasons, CGRS requests that USCIS maintain the regulatory provision stating that USCIS has 30 days from the date an asylum applicant files the initial Form I-765, Application for Employment Authorization (EAD application) to grant or deny that initial employment authorization application.

**The EAD process will take longer:** Eliminating the 30 day deadline for responding to an EAD application, as the Rule proposes to do, will inevitably result in delays for asylum seekers in obtaining their employment authorization in violation of the current statutory and regulatory scheme. Asylum seekers have a right under U.S. law to apply for employment authorization once their cases have been pending without a decision for at least 150 days. The 30 day deadline for USCIS to respond to the application allows the asylum seeker to obtain employment authorization as soon as 180 days has passed without a decision on her case, as provided for in the Immigration and Nationality Act<sup>3</sup> and its implementing regulations.<sup>4</sup> This six month period was a compromise carefully struck to balance the government's goal of adjudicating claims promptly with asylum seekers' need to work to support themselves and their families.<sup>5</sup>

**Asylum seekers need to work as soon as possible to avoid economically precarious and socially vulnerable situations:** Asylum seekers are not entitled to most forms of social welfare benefits and can support themselves only by working. Delaying their employment authorization beyond the current six month period puts them at even greater risk of hunger, potentially abusive living situations, or homelessness, as well as trafficking and other coercive employment practices. Most asylum-seekers have experienced trauma and harm either in their home country or on their journey to safety. This is particularly the case for women asylum seekers as well as LGBTQ asylum seekers.<sup>6</sup> As long as they not able to work, they remain in a highly vulnerable situation having to rely on others, including individuals who may be harming them.

**Rozelle's homelessness crisis:** Just last week, one of CGRS's Haitian clients had a remanded immigration court hearing on her asylum case following a successful appeal. Rozelle (a pseudonym)'s employment authorization document has not yet been issued even though she timely filed for it, and her case has been pending for well over 180 days. While trying to prepare for one of the most important days of her life – her asylum hearing – Rozelle was in crisis due to her precarious living conditions. An acquaintance had been allowing Rozelle to sleep on a mat on her floor temporarily. While Rozelle was waiting for her case to be called at the immigration court, the acquaintance texted her to say she would no longer be able to let Rozelle stay with her. She returned to Miami following the hearing in California where she wandered the streets until a good Samaritan took her in while she finds a more permanent place to stay. Rozelle is now considering crowdfunding simply to help find a place to live.

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<sup>3</sup> 8 U.S.C. 1158(d)(2).

<sup>4</sup> 8 C.F.R. 208.7(a)(1).

<sup>5</sup> See Migration Policy Institute, *The U.S. Asylum System in Crisis: Charting a Way Forward*, Sept. 2018.

<sup>6</sup> See UN High Commissioner for Refugees (UNHCR), *Women on the Run: First-hand Accounts of Refugees Fleeing El Salvador, Guatemala, Honduras, and Mexico*, 26 October 2015, available at: <https://www.refworld.org/docid/56307e2a4.html> [accessed 5 November 2019].

**Asylum seekers can and must be self-reliant given the unavailability of social services:** The sooner asylum seekers can begin to work, the sooner they can be, and begin to feel, self-reliant. The Executive Committee of the Office of the United Nations High Commissioner for Refugees, of which the United States is a member, has recognized that asylum seekers are capable of attaining self-reliance if provided with an opportunity to do so.<sup>7</sup> Providing asylum seekers with an early opportunity to work also recognizes the lack of social services provided by the U.S. government to asylum seekers.

**Employment can help asylum seekers move from dependence on others to contributing to society:** Once employed, an asylum seeker can be a contributing member of U.S. society, and can take pride in providing for herself and her family. This sense of empowerment is particularly important for women refugees, and allows them to begin to heal from their traumatic experiences and regain their confidence.<sup>8</sup>

**Rozelle's job skills are needed:** Rozelle has job skills and, following an available course of study, is planning to work as a home health aide for the elderly once she is authorized to work. This is a difficult job which is not well paid, despite its importance to the clients, their families, and their communities. Rozelle will be making a real contribution to her community by taking on this work once she is allowed to do so.

The current six month wait for employment authorization is difficult enough for asylum seekers. The Rule's proposal to eliminating the 30 day requirement will cause unnecessary suffering, increase the vulnerability of an already traumatized population, and deprive the government of the important skilled labor the asylum seeker will be providing. We call upon USCIS to reject this proposed Rule.

Thank you for the opportunity to submit comments on the rule.

Sincerely,

*Kate Jastram*

Kate Jastram  
Senior Staff Attorney and Gender Asylum Campaign Director  
Center for Gender & Refugee Studies  
[jastramkate@uchastings.edu](mailto:jastramkate@uchastings.edu)

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<sup>7</sup> Executive Committee Conclusion No. 93 (LIII) 2002, in UN High Commissioner for Refugees (UNHCR), *A Thematic Compilation of Executive Committee Conclusions (7th Edition)*, June 2014, available at: <https://www.refworld.org/docid/5698c1224.html> [accessed 1 November 2019].

<sup>8</sup> Women's Refugee Commission, *Refugee women's path to equality and self-reliance*, March 7, 2019, available at <https://www.womensrefugeecommission.org/blog/3458-refugee-women-s-path-to-equality-and-self-reliance>.

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2335

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Individuals seeking refuge in the United States have fled persecution. Persecution takes different shapes and under U.S. requires stringent evidentiary documentation. These individuals as all of us need to support themselves. In order to seek legal employment, they need to have in their hands their Employment Authorization Cards as well as Social Security cards. The agency should issue them within the required thirty (30) days in order to enable them while their Asylum case is adjudicated, to seek legal employment.

Foreign nationals bring skills, education and talent which they can contribute not only to the American society but also to the economy. They pay income taxes.

There is no legal ground to enable the administration to contravene a court order that calls for the agency' efficiency at its best.

Thank you.

AR004142

# PUBLIC SUBMISSION

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<b>Comments Due:</b> November 08, 2019
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2336

Comment Submitted by Mary Talbot

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## Submitter Information

**Name:** Mary Talbot

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## General Comment

Dear U.S. Citizenship and Immigration Services,

As a communications director for a large national community development financial institution, I have had the distinct pleasure of mentoring young communications professionals from Central America who have come to this country legally, seeking asylum and safety from the life-threatening conditions of living in a society where many communities are controlled by gangs. These women have extraordinary gifts to offer, which sadly their home countries are too fractured and dangerous to benefit from.

Without the opportunity to receive expedient employment authorization, they cannot support themselves or their children, many of whom have been threatened with extortion, abduction, rape and death in their home countries. (Imagine having to choose between handing your 11-year-old daughter over to a gang, or seeing her shot these are the histories these young women arrive here with.) These women do not want to be a burden on the U.S. They want to be productive contributors to our society and economy.

I implore you to maintain the expedient processing of employment applications for asylum seekers.

Sincerely,  
Mary Talbot

AR004143

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2337

Comment Submitted by Matthew Webster

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## Submitter Information

**Name:** Matthew Webster

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## General Comment

As an immigration attorney who regularly volunteers time to assist asylum seekers fleeing repressive political regimes and torturous terrorist groups in their home countries, I am writing in opposition to the proposed regulation eliminating the 30-day adjudication of asylum seekers' employment authorization documents. These individuals routinely come to the U.S. with little more than their scars and their skills, and the prompt processing of their employment authorization documentation is the best way to ensure these individuals are able to start piecing their lives together and supporting themselves while they await the long journey of our asylum system.

Delays in asylum seekers receiving their EAD approval can lead to the following:

Lost income to the asylum seeker and their family;

Food insecurity;

Inability to secure a valid ID. A work permit and a social security number (SSN) are often necessary requirements to applications for a state ID;

Risk of homelessness/housing insecurity;

Inability to access health insurance (most state ACA health exchanges require a SSN and work authorization materials to qualify);

Vulnerability to exploitation, trafficking, and underground economy risks;

Lack of access to community service agencies, shelters, and social service programs (many of whom require some form of valid ID, proof of residency, or proof of income);

Loss of ability to support themselves and their families; and

Feelings of fear, desperation, and overall mental health concerns.

Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community.

AR004144

In addition, USCIS admits that all levels of government will lose tax revenue as a result of the proposed rule change. USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

As the law is currently written, asylum seekers must wait 180 days before they may be granted authorization to work. They are permitted to submit their application after 150 days, giving USCIS the 30-day timeframe in question to process the requests. If USCISs goal is to have more time to process each request in order to increase flexibility and free up resources to work on other applications, then it could easily shorten the waiting time before asylum-seekers are allowed to submit their application. If USCIS feels that a 60-day timeframe would be more beneficial, then it may allow applications to be submitted after 120 days, rather than 150. Allowing asylum-seekers to submit their applications earlier could allow the department to have up to 180 days to process and properly vet each individual while reducing the risk of harm to each applicant.

At the very least, please keep this prompt EAD processing intact for the most vulnerable families in our country to enable them to rebuild their lives and contribute to our great nation, still a beacon of hope to so many.

AR004145



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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2338

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The proposed rule change is harmful to our economy. Asylum seekers need to work to provide for themselves and any dependents. We are at low unemployment in this country and we need workers for low skilled jobs that asylum seekers can perform. Promptly processing their applications to work will lessen their dependence on charity and possibly government aid. Workers pay taxes and spend money; both activities benefit the economy.

AR004146

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2339

Comment Submitted by Donovan Bodishbaugh

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## Submitter Information

**Name:** Donovan Bodishbaugh

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## General Comment

This is a blatant and dishonest attempt to discourage asylum seekers and starve out those who do apply. It is un-American, immoral, and a disingenuous attempt to circumvent the asylum laws that Congress has established by inserting a loophole into the process for monkey-wrenching purposes. Asylum seekers are people with the same rights to human dignity and the same worth as native born Americans.

Please stop pandering to anti-immigration extremists, and withdraw this proposed rule. Stop making America Small.

AR004147

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2340

Comment Submitted by Seth Sanders

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## Submitter Information

**Name:** Seth Sanders

**Address:**

123 Grande Ave

Davis, CA, 95616

**Email:** sethlsanders@gmail.com

**Phone:** 773-656-6666

**Submitter's Representative:** Garamendi

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## General Comment

I am against this proposal because it is a waste of our taxpayer money and federal employees time, as well as harmful to asylum seekers. It is impractical to prevent asylum seekers from contributing to our society and economy. It makes them a burden on the system and their friends and families. Asylum seekers should be allowed to work as soon as possible.

AR004148

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2341

Comment Submitted by Michelle Smith

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## Submitter Information

**Name:** Michelle Smith

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## General Comment

I adamantly oppose removing the 30 day processing time for initial employment authorization for asylum applicants. A silent applicants need to be able to work while they Wait for the immigration courts to process their claims. Without work authorization they wont be able to afford attorneys. This will leave many asylum applicants without the due process of being able to afford an attorney. This would be very cruel. If the 30 day processing time is removed the asylum applicants will likely never receive their authorization to work until after their cases are heard

AR004149

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2342

Comment Submitted by Oswald Ted

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## Submitter Information

**Name:** Oswald Ted

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## General Comment

Speedy processing of employment authorization is vitally important to allow asylum seekers to sustain themselves while their cases are pending. The regulation requiring 30-Day adjudication should remain intact.

AR004150

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2343

Comment Submitted by Nancy Taylor

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## Submitter Information

**Name:** Nancy Taylor

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## General Comment

The proposed removal of a 30-day processing provision for Asylum Applicants will result in much hardship for immigrant families: lost job opportunities, and therefore lost income and ability to house, clothe, feed their families. It will also mean less taxable income for the government -- so less benefit to our democratic society.

AR004151

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2344

Comment Submitted by Kevin Littman

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## Submitter Information

**Name:** Kevin Littman

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## General Comment

In reference to DHS Docket No. USCIS-2018-0001, I would like to make the following comments. I am attorney that has represented some asylum seekers on a pro bono basis, and I also have worked with other attorneys at my law firms on representing asylum applicants. The proposed federal rule -- "Removal of 30-Day Processing Provision for Form I-765(c)(8) Employment Authorization Applications" -- is a bad idea, in my opinion. Allowing DHS to have unlimited time to decide if an asylum seeker will be issued a work authorization would unnecessarily harm asylum seekers. Most need to try to find work to try to sustain themselves. Having to wait longer for work authorization only means that asylum seekers will be worse off and will have to look to charities and others while they wait for their work authorization applications to be processed. As is, asylum seekers already face numerous delays in the process. To add more delay would be intolerable and serve no purpose. Indeed, asylum applicants already face a 150 day period before they are eligible to even apply for work authorization. There is no reason to compound this delay. Also, based on my experiences, applicants will face years of delays in having their asylum applications decided. They generally will need to work during that long period of time, and delaying the ability to secure work is unjust. Also, in the end, the delay only burdens society by having more asylum applicants in the U.S. that need to rely on charities for support and are unable to contribute to the economy. From a personal perspective, all the asylum applicants I have known are hard working people who only want to be given a chance to work and provide for themselves, often willing to take on work that is even below their experience level just so that they can make ends meet.

I would also point out that there does not appear to be a real problem that the proposed rule is attempting to fix. Employment Authorization Document applications have been addressed within the required 30 day window for a long time. I do not think there are many, if any, instances of fraud and security concerns that have been unable to be vetted during the 30 day window. I also believe that when additional documentation is requested, currently, the 30 day window is paused, and thus there are currently measures that essentially provide additional time in those instances.

Asylees are people who have fled from persecution in their countries. They often have experienced traumatic

AR004152

experiences. I have clients who have been tortured, abused and received explicit death threats. They seek safe haven in the United States, and they also do not want to be burden. Rather, they want to be able to work to sustain themselves as soon as possible. The proposed rule, by seeking to prolong the time by which they can receive work authorization, would serve only to harm the asylum applicants and burden society by having these asylum applicants unable to support themselves and contribute to society through their work.

Accordingly, it is my opinion that the proposed rule should be withdrawn and the 30 day period remain as it has been.

AR004153



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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2345

Comment Submitted by Francesca Wool

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## Submitter Information

**Name:** Francesca Wool

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## General Comment

I am an attorney who works with asylum seekers as part of my pro bono practice. The ability to seek work authorization is fundamental to ensuring asylum seekers don't have to live in the shadows and risk being mistreated by employers who might use their immigration status as an excuse to skirt labor laws. This new regulation would have cruel and devastating effects on asylum seekers and I demand that USCIS fully analyze the full consequences before implementing this misguided rule. Stop avoiding our legal duty to provide safe harbor to asylum seekers and retract this effort to further deter asylum seekers who have a legal right to seek asylum in this country and be treated like human beings, including the right to contribute meaningfully to our economy. Based on your ability to adjudicate 99% of employment authorizations in the past, there is absolutely no logical reason for this proposed rule except malice. Step up, USCIS, and do your job.

AR004154

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2346

Comment Submitted by Sandra Filby

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## Submitter Information

**Name:** Sandra Filby

**Address:**

2263 La Mesa Ct  
Davis, CA, 95616

**Email:** Sfilby@icloud.com

**Phone:** 530-756-8524

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## General Comment

ASYLUM SEEKERS SHOULD BE ABLE TO WORK AS SOON AS POSSIBLE. NOTHING ELSE MAKES SENSE.

AR004155

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2347

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Asylum seekers deserve the right to work and obtain work authorization quickly to support themselves and their families. The current regulations should not be changed.

AR004156

# PUBLIC SUBMISSION

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2348

Comment Submitted by Kristen Tully, Massachusetts Law Reform Institute

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## Submitter Information

**Name:** Kristen Tully

**Submitter's Representative:** Massachusetts Law Reform Institute

**Organization:** Massachusetts Law Reform Institute

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## General Comment

See Attached File

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## Attachments

EAD Comments MLRI

AR004157

*Submitted online via the Federal eRulemaking Portal*

November 8, 2109

Samantha Deshommes, Chief  
Regulatory Coordination Division  
Office of Policy and Strategy  
U.S. Citizenship and Immigration Services, Department of Homeland Security  
[20 Massachusetts Avenue NW](#)  
Mailstop #2140  
Washington, D.C. 20529-2140

Re: DHS Docket No. USCIS-2018-0001  
84 F.R. 47148

Dear Ms. Deshomees:

The Massachusetts Law Reform Institute (MLRI) respectfully submits this comment opposing the Department of Homeland Security's Notice of Proposed Rulemaking on Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications, DHS Docket No. USCIS-2018-0001, issued September 9, 2019.

Providing prompt employment authorization for persons fleeing to the United States to seek safety as asylum seekers has been a long-standing and integral part of the humanitarian protections in American immigration law. Employment authorization for asylum seekers is specifically authorized by the Immigration and Nationality Act ("INA") while their asylum claims are being processed in the U.S. Employment authorization is a practical measure enabling asylum seekers to meet their basic human needs of food, shelter and clothing while their cases are adjudicated, and the right to work is inextricably linked to the dignity and freedom of an individual living within a lawful society.

For 50 years, Massachusetts Law Reform Institute (MLRI) has provided statewide advocacy and leadership in the Commonwealth of Massachusetts, advancing laws, policies, and practices that secure economic, racial, and social justice for low-income people and communities. As the poverty law support center for the Massachusetts civil legal aid delivery system and advocacy community, we are particularly alarmed about the negative consequences of the rule's authorization of additional delays in the provision of employment authorizations to asylum-seekers; this will have a profound effect on low-income families in Massachusetts and throughout the United States.

MLRI's advocates provide expertise and support to local legal aid programs, social service, health care and human service providers, and community organizations that serve low-income people, and present trainings to thousands of lawyers and advocates working with immigrants in

need. Employment is a building block for asylum seekers to establish self-sufficiency in the United States. Asylum-seeking immigrants across the New England area fill critical roles in our employment workforce, and denying their right to work for indefinite lengths of time will harm them individually, and will also harm our economy and social services support systems. Delaying the grant of employment authorization to destitute asylum seekers is antithetical to MLRI's mission of furthering policies and procedures which aspire to break the cycle of poverty.

The rule's elimination of the 30-day adjudication standard on issuing an employment authorization document (EAD) for an asylum seeker will result in unlawfully prolonging the statutory waiting period for such EADs, lead to litigation challenging the unreasonableness of adjudication delays, unjustifiably interfere with asylum-seekers' means of working lawfully, deprive them of other rights that depend on the possession of an EAD, affect asylum-seekers' mental health and access to trauma-correcting services, jeopardize their ability to find a lawyer they can afford in proceedings where lawyers are increasingly determinative of outcomes, and will harm not only asylum-seekers and their families but the broader society in which they live.

1. The rule would unlawfully extend the statutory 180-day waiting period

INA § 208(d)(2) imposes a 180-day waiting period before employment authorization may be provided to eligible asylum applicants. However, by regulation, DHS bars applicants from applying for EADs before 150 days have passed. 8 C.F.R. 208.7(a)(1). The effect of eliminating the 30-day processing deadline, therefore, is to extend the statutory 180-day waiting period by regulation beyond the period authorized by Congress. Although the statute affords the agency some discretion regarding employment authorization generally, it does not authorize the agency to impose its own waiting period instead of the one expressly ordained by Congress.

2. DHS has proposed no alternative timeline

Notably, DHS has proposed no alternative timeline. While the agency reportedly has considered replacing the 30-day timeframe with a 90-day timeframe, as proposed, this rule removes any timeframe - authorizing the agency to exceed a 90-day adjudication standard or a longer one. Even if DHS were to eliminate the 150-day limit on early filing in the rest of the regulations in order to address the legal deficiency (described in Section 1 above), the absence of an express adjudication deadline is likely to result in unnecessarily lengthy adjudication periods for EAD applications which are relatively simple to resolve and should not require more than 30 days.

As a legal services support resource center, MLRI already fields many inquiries from lawyers who are trying to respond to requests that "stop the clock" and impose extra wait times for EADs even under the 30-day rule, a problem that interferes with asylum-seekers' ability to integrate into society through lawful employment and access to services contingent on immigration status and documentation (see Section 4 below). Forcing this class of noncitizens to wait beyond the already burdensome 180-day statutory waiting period, as it has already been interpreted and prolonged by agency policy, is likely to further prolong EAD adjudications beyond periods that courts have deemed unreasonable in other contexts.

### 3. DHS is able to meet the 30-day processing timeline

Reports indicate that DHS is in fact able to decide upwards of 99% of EADs within the 30-day processing timeline. Maintaining that pace, in light of the serious needs of asylum seekers to have employment authorization in order to meet their basic needs and aid them in recovering from the traumas that inhere in persecution and the urgent nature of the flight from persecutory conditions, is an attainable measure. Given the relative simplicity of the EAD adjudication, no reasonable justification exists for pushing the time out, particularly in consideration of the significant hardship it would impose on asylum applicants and those who depend on them for support. The inability to work destabilizes asylum applicants - not only financially, but by causing repercussions on their health, housing, and safety, as well as that of their family members. The trauma that leads asylum seekers to seek haven in the United States would only be exacerbated if they could not work, meet their basic human needs, and integrate effectively into a new society, but were instead rendered sick or homeless or emotionally more vulnerable.

### 4. Access to legal services and other rights and services

Immigrants without employment and related identifications have limited access to many basic services, such as drivers licenses, bank accounts, basic health care, and housing. Also, given resource constraints on available legal services, some asylum seekers must rely on private lawyers; without an income, however, they cannot afford the legal counsel that is essential to effectively present a claim for asylum. Studies indicate that unrepresented asylum seekers are less likely to obtain asylum relief. Indeed, legal representation is the most determinative factor in whether an individual will successfully obtain immigration relief.<sup>1</sup> Individuals with counsel fare better at every stage of the court process with higher rates of pleadings for relief and increased success in outcomes, including on asylum claims, and are also 15 times more likely to even submit an application for relief.<sup>2</sup>

### 5. Employment is an integral piece of an individual's health and well-being

Working productively is a vital part of one's health and well-being: it gives those who are able to work a purpose and an income, promotes independence, develops social contacts, and is a factor in preventing physical and mental health problems.<sup>3</sup> Being employed can be an important step in reducing psychological distress and improving self-esteem and can aid in recovery, while conversely, the longer that people are unemployed, the more likely they are to report signs of

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<sup>1</sup> Ingrid Eagly & Steven Shafer, *A National Study of Access to Counsel in Immigration Court*, 164 U. Pa. L. Rev. 1, 8 (2015) ("National Study"),

[https://scholarship.law.upenn.edu/cgi/viewcontent.cgi?article=9502&context=penn\\_law\\_review](https://scholarship.law.upenn.edu/cgi/viewcontent.cgi?article=9502&context=penn_law_review); See Peter Markowitz, et al., *Accessing Justice: The Availability and Adequacy of Counsel in Removal Proceedings*, 33 Cardozo L. Rev. 357 (2011-2012) ("Accessing Justice"),

<https://brooklynworks.brooklaw.edu/cgi/viewcontent.cgi?article=1551&context=faculty>.

<sup>2</sup> See *National Study*, *supra* note 1, at 4.

<sup>3</sup> Sita Diehl et al., *Road to Recovery: Employment and Mental Illness*, National Alliance on Mental Illness, (Jul. 2014), <https://www.nami.org/about-nami/publications-reports/public-policy-reports/roadtorecovery.pdf>



poor psychological well-being.<sup>4</sup> The loss of hope that can accompany unemployment may be detrimental not only to job seekers' quality of life, but also to their ability to ultimately obtain a job.<sup>5</sup> Given the importance of hope and resilience in the refugee population, providing timely employment opportunity for asylum seekers, who have typically experienced or witnessed trauma in their home country, is especially vital.

Unemployed persons are more likely to suffer physical ailments as well. In addition to increased rates of depression and reports of “feelings of sadness and worry”, unemployed workers are “more likely than those continuously employed to have fair or poor health, and to develop a stress-related condition, such as stroke, heart attack, heart disease, or arthritis.”<sup>6</sup>

9. Unemployment and inability to support oneself will cause asylum seekers to be more vulnerable to exploitation, trafficking, and underground employment risks such as unsafe working conditions

Delaying authorization to work to an asylum seeker will deepen their vulnerability on many levels - lack of money, lack of food, and lack of ability to obtain safe housing, community integration and improved mental health - all factors important to preventing a vulnerable asylum seeker from being preyed upon due to these conditions.<sup>7</sup> The U.S. government has placed resources and pledged commitment to preventing trafficking and ending the practice, and this policy of significantly delaying the key to self-sufficiency runs contrary to the government's anti-trafficking goals.<sup>8</sup>

6. Delaying EADs will injure non-profit service providers and other charitable and faith-based organizations

The indefinite adjudication delay permitted by this rule would burden and stretch the capacity of charities and non-profit service providers. Asylum-seekers who are unable to obtain an EAD in a timely manner will be forced to seek other forms of support, including from organizations that provide financial, housing, legal, health care, or other assistance with meeting basic human needs. Given the number of asylum-seekers this rule would affect, it is not realistic to expect that these entities can meet these needs without harming the families and individuals these charitable resources currently help.

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<sup>4</sup> Steve Crabtree, *In U.S., Depression Rates Higher for Long-Term Unemployed*, Gallup (Jun. 9, 2014), <https://news.gallup.com/poll/171044/depression-rates-higher-among-long-term-unemployed.aspx>.

<sup>5</sup> *Id.*

<sup>6</sup> *How Does Employment - or Unemployment - Affect Health*, Robert Wood Johnson Foundation, (March 12, 2013), <https://www.rwjf.org/en/library/research/2012/12/how-does-employment--or-unemployment--affect-health-.html>

<sup>7</sup> National Human Trafficking Resource Center, *Educators and Human Trafficking: In Depth Review*, Polaris Project, pg. 4-5, (Jan. 2010), <https://humantraffickinghotline.org/sites/default/files/In%20Depth%20Review%20for%20Educators.pdf>

<sup>8</sup> U.S. Department of State, Office to Monitor and Combat Trafficking in the United States, *Report on U.S. Efforts to Combat Trafficking in Persons*, (Oct. 29, 2019), <https://www.state.gov/bureaus-offices/under-secretary-for-civilian-security-democracy-and-human-rights/office-to-monitor-and-combat-trafficking-in-persons/>



7. Employers will be adversely affected by delaying asylum applicants' lawful labor force participation

The U.S. economy currently faces labor shortages in many sectors, and the employment data for Massachusetts indicates historical low rates of unemployment at 2.9 percent.<sup>9</sup> The most recent rate is lower than the prior 12 months and consistent with the low national unemployment rate declining to 3.5 percent as reported by the U.S. Bureau of Labor Statistics on October 18, 2019.<sup>10</sup> Notably, the lowest unemployment rate in the nation is in the New England state of Vermont at 2.2 percent.<sup>11</sup> Delaying EADs to asylum-seekers deprives employers of potential workers important to maintain the growth of the economy and who enable their businesses to thrive and provide desired goods and services.

8. EAD delays cause loss of valuable tax revenues on which the Massachusetts economy and the U.S. economy depend

Local, state, and federal governments will lose income tax revenue if asylum-seekers are delayed or indefinitely prevented from entering the job market or pushed into the “shadow” economy by working without authorization. DHS itself estimates that the annual loss in Medicare and social security revenue will be between \$39.15 to \$118.54 million dollars. DHS estimates the rule will cause asylum-seekers to annually lose \$255.88 to \$774.76 million in income.<sup>12</sup>

Conclusion

The tremendous vulnerability of this population cannot be understated, as asylum seekers often arrive in this country with no means and assets, having fled for their lives. Obtaining permission to work as soon as possible is essential for them to access basic means of survival - food, shelter, and clothing - as well as become productive and healthy members of their communities in spite of the adversities they have overcome. Given these considerations, there is no reasonable justification for eliminating the existing 30-day adjudication mandate, and we strongly urge you not to finalize this proposed rule.

Respectfully submitted,

Deirdre Giblin, Immigration Attorney  
Iris Gomez, Senior Immigration Attorney

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<sup>9</sup> See Bureau of Labor Statistics, *Databases, Tables & Calculators by Subject*, United States Dep't of Labor, (accessed Nov. 7, 2019), [https://data.bls.gov/timeseries/LASST250000000000004?amp%253bdata\\_tool=XGtable&output\\_view=data&include\\_graphs=true](https://data.bls.gov/timeseries/LASST250000000000004?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true); Bureau of Labor Statistics, *State Employment and Unemployment Summary*, United States Dep't of Labor, (Oct. 18, 2019), <https://www.bls.gov/news.release/laus.nr0.htm>; Bureau of Labor Statistics, *Boston, MA-NH, Area Economic Summary*, United States Dep't of Labor, (Oct. 2, 2019), [https://www.bls.gov/regions/new-england/summary/blssummary\\_boston.pdf](https://www.bls.gov/regions/new-england/summary/blssummary_boston.pdf).

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> 84 FR 47148, 47150.

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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<b>Submission Type:</b> Web

**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2349

Comment Submitted by Charlotte Morgan

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## Submitter Information

**Name:** Charlotte Morgan

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## General Comment

You need to support President Trump's immigration, policies for safety of our country.

AR004163

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2350

Comment Submitted by Anonymous

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The government cannot be trusted to stick to any timeframe. Keep the 30 day processing law. Asylees who are here need to work so that my taxes don't support them!

AR004164

# PUBLIC SUBMISSION

<b>As of:</b> September 15, 2020
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2351

Comment Submitted by Jacob Huju, Immigrant Legal Center

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## Submitter Information

**Name:** Jacob Huju

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## General Comment

To whom it may concern:

I am an immigration attorney working for the Immigrant Legal Center in Nebraska. Many of my clients are asylum seekers or family members of asylum seekers. I have witnessed the struggles people face when they are unable to work. Here in the Omaha Immigration Court, the final hearing on an asylum case could take almost four (4) years to be scheduled. During that time, for the safety and security of asylum seekers, and for the economic well-being of the communities in which they live, they must be able to have permission to work.

Not requiring expedient adjudication of asylum-seekers work permit applications effectively denies them the opportunity to work, and places them in great danger of becoming destitute. Asylum seekers would lose wages and benefits as a result of delayed entry into the U.S. labor force, straining their ability to support themselves and their families. USCIS admits that lost compensation to asylum applicants ranges from \$255.88 million to \$774.76 million in taxable income per year. The loss of income to asylum-seekers will cause an outsized amount of harm to this already-vulnerable community. A lack of income means not being able to afford food, housing, medical treatment, health insurance, or legal representation. Furthermore, individuals will be unable to secure a valid ID (needed for many social services) and be increasingly vulnerable to exploitation, trafficking, and underground economic risks. The lack of ability to work and correlating lack of income also vastly increases the risk that people coming to the United States will become a public charge.

This proposed rule change is part and parcel of this administrations effort to make the U.S. a hostile destination for individuals fleeing persecution in their countries of origin. This is evidenced by this rule change as well as the third-country transit bar, the proposed wide-sweeping public charge rule, and the institution of the so-called Migrant Protection Protocols. By removing the ability of asylum seekers to gain meaningful employment within a short and predictable timeframe, the Trump Administration effectively turns asylum seekers into the very public charges it seeks to exclude. Additionally, this policy change would make the work authorization process more unpredictable and inefficient by removing the ability to hold USCIS accountable to any deadline.

AR004165

An alternative to the proposed rule change would be to allow asylum seekers to apply for work authorization 120 days after they applied for asylum. This alternative would allow USCIS 60 days to adjudicate the application for work authorization, and would still allow asylum-seekers the opportunity to work 180 days after applying for asylum.

I urge you to examine the true purpose behind the proposed rule change. I also ask that you examine the likely effects of changing the rule: vulnerable people being made more vulnerable by the US government, rather than being treated humanely.

Thank you for your time,

Jacob Huju  
Supervising Attorney  
Immigrant Legal Center, Omaha, NE

AR004166

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2352

Comment Submitted by David Lichtenhan, Yolo Interfaith Immigration Network

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## Submitter Information

**Name:** David Lichtenhan

**Address:**

2263 La Mesa Ct  
Davis, CA, 95618

**Email:** Dlich2263@icloud.com

**Phone:** 530-902-5432

**Submitter's Representative:** Hon John Garamendi

**Organization:** Yolo Interfaith Immigration Network

**Government Agency Type:** Federal

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## General Comment

Asylum Seekers need to be allowed to work to support themselves and their families. How them to become human beings. 180 days is too long as it is. Please do not extend the waiting period

AR004167

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2353

Comment Submitted by Timothy Langley

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## Submitter Information

**Name:** Timothy Langley

**Address:**

1512 Don Gaspar Ave.

Santa Fe, NM, 87505

**Email:** timothyjlangley@gmail.com

**Phone:** (605)370-0116

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## General Comment

I oppose the removal of the 30-day deadline for processing the employment authorization applications of asylum seekers for the following reasons:

1. Asylum seekers are in the U.S. legally. While some of their asylum claims may not ultimately be vindicated, they are within their rights under international and U.S. law to enter our country, present themselves to immigration officials, and make the claim that they qualify for asylum protection.
2. The 30 day deadline for the government to decide whether an applicant should be issued an employment authorization while the asylum claim itself remains pending is reasonable. Thirty days gives the government sufficient time to make an informed decision about the relatively straightforward question of whether to authorize employment. But more than thirty days makes it increasingly impossible for applicants, particularly those with families, to support themselves legally.
3. Doing away with any deadline for the government to act on employment authorization applications is effectively to allow the government to deny asylum claims, including valid claims, simply by doing nothing. To cause critical legal relief to be withheld indiscriminately from asylum seekers who might well be entitled to it without the application of legal standards to their individual circumstances is a fundamentally unfair denial of due process.
4. Asylum seekers who work a job are conferring a benefit on U.S. society directly through the work they perform and indirectly through the federal, state and local taxes they pay. It is unfair to U.S. citizens to foreclose

AR004168

the possibility that employed asylum seekers might defray some costs associated with the adjudication of their claim.



# PUBLIC SUBMISSION

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<b>Tracking No.</b> 1k3-9d75-yjt8
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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2354

Comment Submitted by Raul Pinto

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## Submitter Information

**Name:** Raul Pinto

**Address:**

P.O. Box 28068

Raliegh, NC, 27611

**Phone:** 919-861-1469

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## General Comment

Gentlemen/Ladies:

I write in opposition to the proposed rule that would remove the 30 day processing requirement provision for asylum applicants requesting employment authorization. Given the extensive delays in processing employment authorization, the proposed rule would be extremely harmful to asylum applicants. In my work, I see asylum applicants on a regular basis who need to obtain a work permit as quickly as possible so that they can support themselves during the arduous process of applying for asylum defensively or affirmatively. A work permit allows asylum applicants to participate in the country's economy and society, and having this participation as quickly as possible, is important to recover from the usually traumatic experiences that brought them to the U.S. Additionally, many states, including North Carolina, require a Social Security number for an individual to obtain a driver's license. A driver's license is thus crucial for individuals in the asylum process get to their court dates, obtain legal representation, take children to school, and otherwise return to some modicum of normalcy in their lives.

I believe that the agency should process these applications for employment authorization as soon as possible, and this rule is counter to this principle. I respectfully request the agency to not adopt this rule.

AR004170

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2355

Comment Submitted by Veronica Amaya

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## Submitter Information

**Name:** Veronica Amaya

**Address:**

4223 Center St

Omaha, NE, 68105

**Email:** veronica@immigrantlc.org

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## General Comment

If you take the option of obtaining a work permit so asylum seekers can apply for one it will harder on their families and them. This would be inhuman and it would also create more stress on these families who are already trying to seek refuge because of horrible conditions in their country.

AR004171

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2356

Comment Submitted by Jose Miranda

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## Submitter Information

**Name:** Jose Miranda

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## General Comment

I am an immigration attorney with a lot of experience working with asylum seekers. Asylum seekers leave violence and unstable conditions in their own country to try to start anew in the US. To take away this 30-day limit would threaten their ability to live under relatively stable conditions while their immigration proceedings take place. Without work permits, asylum seekers would be forced to either not work or to work for low pay under poor conditions. We need to start living by more humane values in the US. Relegating people to poverty is the opposite of that.

AR004172

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2357

Comment Submitted by Sarah Osten

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## Submitter Information

**Name:** Sarah Osten

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## General Comment

I am a professor of Latin American history and have studied and teach about US immigration policy in the modern era.

Asylum seekers should be allowed to pursue legal employment via work visas while their cases are pending, as has been the law in the US for decades now.

The proposed change to do away with the 30 day processing deadline is harmful to asylum seekers and their families, and will meaningfully decrease their ability to economically sustain themselves. They will also be rendered more vulnerable in other ways if they lack work permits which are often required for people to obtain official identifications and access public services and social programs.

It will also be harmful to the US economy. By its own estimate, USCIS projects a loss of \$39.15 million to \$118.54 million per year because delayed work authorization will prevent asylum seekers and their employers from contributing to Medicare and social security.

There is no administrative justification for this delay, as USCIS has historically been able to process these work authorizations within the required 30 days in nearly all cases.

The only clear objective of this change is to further undermine the asylum-seeking process by dis-incentivizing people to seek asylum in the first place. We can see clearly that this broader effort is both ineffective in achieving its aims and furthermore undermines the fundamental commitments of this country both to international law and the upholding of the basic human rights of asylum seekers.

AR004173

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**Docket:** USCIS-2018-0001

Removal of 30-Day Processing Provision for Form I-765 (c)(8) Employment Authorization Applications

**Comment On:** USCIS-2018-0001-0001

Removal of 30- Day Processing Provision for Asylum Applicant- Related Form I-765 Employment Authorization Applications

**Document:** USCIS-2018-0001-2358

Comment Submitted by Marie Soueid on behalf of The Attorneys General of New Jersey, California, Colorado, Connecticut, Delaware, the District of Columbia, Hawaii, Illinois, Iowa, Massachusetts, Michigan, Minnesota, Nevada, New Mexico, New York, Oregon, Vermont, Virginia, and Washington

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## Submitter Information

**Name:** Marie Soueid

**Address:**

25 Market Street  
P.O. Box 112  
Trenton, 08

**Email:** marie.soueid@law.njoag.gov

**Phone:** 609-376-2564

**Submitter's Representative:** Marie Soueid

**Organization:** Attorneys General of NJ, CA, CO, CT, DE, DC, HI, IL, IA, MA, MI, MN, NV, NM, NY, OR, VT, VA, WA

**Government Agency Type:** State

**Government Agency:** Attorneys General

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## General Comment

The Attorneys General of New Jersey, California, Colorado, Connecticut, Delaware, the District of Columbia, Hawaii, Illinois, Iowa, Massachusetts, Michigan, Minnesota, Nevada, New Mexico, New York, Oregon, Vermont, Virginia, and Washington write to oppose the Department's proposed rule. Please find our comment letter attached.

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## Attachments

2019.11.08 EAD Comment\_States AG\_Final

FNs 1-22 Combined

AR004174

FNs 22-28 Combined

FNs 31-33 Combined

FNs 42-49 Combined

FNs 50-60 combined

FN 34

FN 37

FN 35

FN 39

AR004175



THE STATE OF NEW JERSEY  
OFFICE OF THE ATTORNEY GENERAL

THE STATE OF CALIFORNIA  
OFFICE OF THE ATTORNEY GENERAL



GURBIR S. GREWAL  
ATTORNEY GENERAL

XAVIER BECERRA  
ATTORNEY GENERAL

November 8, 2019

Via Federal eRulemaking Portal  
Kevin McAleenan, Acting Secretary  
Department of Homeland Security  
Kenneth T. Cuccinelli, Acting Director  
U.S. Citizenship and Immigration Services  
Samantha Deshommes, Chief  
Regulatory Coordination Division, Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
20 Massachusetts Avenue, NW  
Washington, D.C. 20529-2140

RE: Comments on *Removal of 30-Day Processing Provision for Asylum Applicant Related Form I-765 Employment Authorization Applications*, 84 Fed. Reg. 47,148 (Sept. 9, 2019), RIN 1615-AC19

Dear Acting Secretary McAleenan, Acting Director Cuccinelli, and Chief Deshommes:

We, the undersigned Attorneys General of New Jersey, California, Colorado, Connecticut, Delaware, the District of Columbia, Hawaii, Illinois, Iowa, Massachusetts, Michigan, Minnesota, Nevada, New Mexico, New York, Oregon, Vermont, Virginia, and Washington. (“The States”), write to oppose the U.S. Department of Homeland Security’s (“the Department”) proposal to eliminate the 30 day processing deadline for asylum related Employment Authorization Documents (“EAD” or “work permits”). *Removal of 30-Day Processing Provision for Asylum Applicant Related Form I-765 Employment Authorization Applications*, 84 Fed. Reg. 47,148, (Sept. 9, 2019); RIN 1615-AC19 (“Proposed Rule”).

This Proposed Rule would eliminate the 30 day deadline by which work authorization applications for asylum seekers must be adjudicated. Currently, asylum seekers must wait until 150 days after their asylum applications are submitted to seek a work permit. Once they submit such a request, however, the Department must grant or deny the work permit within 30 days. 8

AR004176

C.F.R. § 208.7. This rule would eliminate that deadline and grant the Department an indefinite amount of time to adjudicate a simple work permit application.

The Proposed Rule will seriously harm asylum seekers by making them unable to work legally for an indefinite time period, and in harming this population, the Proposed Rule will also harm the States. Every year, the States welcome thousands of asylum seekers, who contribute greatly to the States' communities and economies.<sup>1</sup> Indeed, in 2015-2017, the most recent years for which this data is available, the States signatory to this letter constituted six of the top ten states of residence for individuals whose affirmative asylum applications were granted.<sup>2</sup> Combined, these six States were home to 68 percent of the individuals granted affirmative asylum applications in the United States.<sup>3</sup> By making it harder for asylum seekers to work, the Proposed Rule will lower tax revenue for the States, harm the States' industries, increase reliance on State-funded programs, and make it harder for the States to enforce their labor and civil rights laws.

Not only is the Proposed Rule bad policy, but it also would violate the law if enacted. This Proposed Rule, if finalized, would be arbitrary and capricious in violation of the Administrative Procedure Act (APA) because the Department did not provide the reasoned justification required for a significant policy change. Likewise, the Department did not conduct the regulatory analysis required under federal law and executive orders because the Department did not consider the fiscal costs of the Proposed Rule or whether it was the least burdensome alternative.

## **I. The Proposed Rule Will Harm Asylum Seekers**

Asylum seekers leave everything behind—their homes, jobs, and sometimes families—to escape persecution and find a better life. Many arrive after having exhausted all of their resources to get to the United States. The Department estimates that migrants, including asylum seekers, may pay up to \$9,200 to arrive in the United States.<sup>4</sup>

These individuals face prolonged unemployment once they reach the United States. Asylum seekers must wait 150 days after the submission of their asylum applications before they can apply for a work permit, and during this time, it is common for them to face severe housing and financial insecurity.<sup>5</sup>

But, under the current regulations, that waiting period must have a certain end. Under 8 CFR § 208.7(a)(1), U.S. Citizenship and Immigration Services (USCIS) must process EAD

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<sup>1</sup> Dep't of Homeland Sec., *2017 Yearbook of Immigration Statistics* 43 tbl.16 (Apr. 1, 2019), <https://tinyurl.com/y2tzh7ry>; Nadwa Mossad, Office of Immigration Statistics, Dep't of Homeland Sec., *Annual Flow Report: Refugees and Asylees: 2017* (Mar. 2019) <https://tinyurl.com/y4kfuclj>.

<sup>2</sup> Mossad, *supra* note 1, at tbl. 13.

<sup>3</sup> *Id.*

<sup>4</sup> Dept. of Homeland Security, *Efforts by DHS to Estimate Southwest Border Security Between Points of Entry* (Sept. 2017) at 13-14, available at <https://tinyurl.com/y9gbn5js>.

<sup>5</sup> Human Rights First, *Callous and Calculated: Longer Work Authorization Bar Endangers Lives of Asylum Seekers and Their Families* (April 29, 2019) <https://tinyurl.com/HRFworkpermit>.



applications within 30 days of their submission, allowing applicants to receive EADs within six months of filing their asylum application so that they can begin to work and find the stability that comes with a steady paycheck. In the past, the Department regularly failed to comply with this requirement. This failure resulted in the 2017 court order in *Rosario v. USCIS*, 365 F. Supp. 3d 1156, 1162 (W.D. Wash. 2018), which enforces the 30 day deadline.

In eliminating the regulatory timeframe entirely, the Department anticipates that EAD applications will be delayed to the 2017 levels that existed before the order in *Rosario*, 365 F. Supp. 3d at 1162. 84 Fed. Reg. at 47,149. Troublingly, with no alternative deadline in the Proposed Rule, the Department's estimate is just speculation. Indeed, under the Proposed Rule, applicants could wait an indefinite time period. And even assuming that the Department's estimate is correct, it was USCIS's delay in processing EAD applications in 2017 that caused the *Rosario* court serious concern. At the time of that order, only 52 percent of EAD applications were processed within 30 days, 82.8 percent within 60 days, and thousands were delayed for over three months. *Rosario*, 2:15-cv-00813, (W.D. Wash.), ECF No. 146-1 (Aug. 6, 2019). The court explained, "in 2017, 10,103 applications took over 121 days to adjudicate, on top of the 150 days those applicants already had to wait, unable to work, after filing their asylum application." *Rosario*, 365 F. Supp. 3d, at 1162. According to the court, this delay caused a "negative impact on human welfare." *Id.*

The delayed EAD processing times that will result from the Proposed Rule will have the same negative impacts on human welfare that concerned the *Rosario* court. If EADs are delayed, asylum seekers will be unable to support themselves or their loved ones. This will reverberate in nearly every aspect of their lives—from their health to their ability to successfully claim asylum. Furthermore, without the ability to earn a living legally, many will have no choice but to work without authorization, making them vulnerable to exploitation and dangerous conditions.

#### **a. The Proposed Rule puts asylum seekers' well-being at risk**

Prolonged unemployment and resulting poverty will harm asylum seekers' well-being in numerous ways, impacting their physical health, mental health, and ability to find stable housing, as well as their asylum cases.

First, the delay of EADs will have negative physical health consequences. Without employment and employer-sponsored healthcare, asylum seekers will be unable to afford health insurance, which directly correlates with health outcomes.<sup>6</sup> Stress and environmental factors stemming from poverty have a negative impact on health as well.<sup>7</sup> For these reasons, low-income adults in the United States have higher rates of physical limitations, heart disease, diabetes,

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<sup>6</sup> Steffie Woolhandler, MD et al, *The Relationship of Health Insurance and Mortality: Is Lack of Insurance Deadly?*, ANNALS OF INTERNAL MEDICINE (Sept. 19, 2017), <https://tinyurl.com/Woolhandler>; Institute of Medicine Committee on the Consequences of Uninsurance, *Care Without Coverage: Too Little, Too Late, Effects of Health Insurance on Health*, National Academies Press (2002), available at: <https://www.ncbi.nlm.nih.gov/books/NBK220636/>.

<sup>7</sup> Dheuv Khullar & Dave A. Chokshi, *Health, Income, & Poverty: Where We Are & What Could Help*, HEALTH AFFAIRS (October 4, 2018), <https://tinyurl.com/KhullarChokshi>.

stroke, and other chronic conditions, compared to higher-income Americans.<sup>8</sup> Poor adults are five times as likely as those with incomes above 400 percent of the federal poverty level to report being in poor or fair health.<sup>9</sup> These poor health outcomes for adults likewise hurt children, who recently have become a common population seeking asylum with their families.<sup>10</sup> Children in poor families are seven times more likely to have poor or fair health than children in affluent families.<sup>11</sup> The health consequences of childhood poverty can last throughout a lifetime.<sup>12</sup>

Second, prolonged financial instability from unemployment will exacerbate the trauma and mental anguish from which many asylum seekers already suffer. Asylum seekers often face multiple layers of traumatic experiences before seeking asylum in the United States. Indeed, to even be eligible for this type of relief, an individual must have suffered extreme harm that rises to the level of persecution in their home country, or live under the threat of such persecution in the future. *See* 8 U.S.C. § 1158. The Center for Victims of Torture estimates that 44 percent of asylum seekers, asylees, and refugees in the United States are survivors of torture.<sup>13</sup> Studies show that “asylum seekers are at particular risk of developing mental illness, including post-traumatic stress disorder (PTSD), depression and anxiety.”<sup>14</sup> Such asylum seekers already face an uncertain future given the long delays in the adjudication of their claims—indeed, some immigration courts are setting asylum hearings as far out as 2024, meaning that asylum seekers sometimes will wait five years to know their fate.<sup>15</sup> Per Human Rights First: “[s]everal studies have shown that extended delays in adjudicating claims—and the resulting uncertainty in asylum seekers’ futures—are associated with psychological distress ‘above and beyond the impact of traumatic events.’”<sup>16</sup>

The Proposed Rule will make these issues even worse because financial stability and employment are intrinsically related to mental health. The inability to work can take a “physical and emotional toll” on a person.<sup>17</sup> Studies show that the “long-term unemployed have at least a

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<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> Adolfo Flores, *Here's Why A Record Number Of Families Are Actually Showing Up At The Border*, BUZZFEED NEWS (May 8, 2019), <https://tinyurl.com/FloresBuzzfeed>.

<sup>11</sup> Robert Wood Johnson Foundation, *Overcoming Obstacles to Health*, 11 (Feb. 2008) <https://tinyurl.com/ObstacletoHealthReport>.

<sup>12</sup> *Id.* at 9.

<sup>13</sup> Craig Higson-Smith, *Updating the Estimate of Refugees Resettled in the United States Who Have Suffered Torture*, CENTER FOR VICTIMS OF TORTURE, available at <https://tinyurl.com/y358lp3k>; Dep’t of Human Services, Office of Refugee Resettlement, *Services for Survivors of Torture*, <https://tinyurl.com/yyjvt4u3>.

<sup>14</sup> Piyal Sen, *The mental health needs of asylum seekers and refugees – challenges and solutions*, BJPSYCH INTL. (May 1, 2016), available at <https://tinyurl.com/yyqd79xt>.

<sup>15</sup> TRAC Immigration, *Immigration Court's Active Backlog Surpasses One Million* (June 2019) <https://trac.syr.edu/immigration/reports/574/>; Diane Solis, *Judges, lawyers say video justice is just adding to the mess within U.S. immigration courts*, DALLAS MORNING NEWS (Sept. 28, 2019) <https://tinyurl.com/SolisDallasMorningNews>.

<sup>16</sup> Human Rights First, *In the Balance Backlogs Delay Protection in the U.S. Asylum and Immigration Court Systems*, 13 (April 2016) <https://tinyurl.com/yyr82bem>.

<sup>17</sup> Human Rights Watch, *“At Least Let Them Work” The Denial of Work Authorization and Assistance for Asylum Seekers in the United States* (Nov. 12, 2013) <https://tinyurl.com/yx9vp5wf>.

twofold risk of mental illness, particularly depression and anxiety disorders, compared to employed persons.”<sup>18</sup> Financial stress is the second most common cause of suicide.<sup>19</sup> People in debt are three times as likely to have a mental health issue, especially depression, anxiety, and psychotic disorders.<sup>20</sup> And in a survey of nearly 5,500 people who experience mental health problems, 86 percent of respondents said that their financial situation had made their mental health problems worse.<sup>21</sup> Conversely, one study found that for asylum seekers especially, employment can “ameliorate[] psychiatric symptoms,” serve a protective function, reduce stress and anxiety, and “increase a sense of self-agency.”<sup>22</sup>

Third, many asylum seekers, and particularly those who cannot lean on the support of family or friends in a new country, could become homeless without work authorization.<sup>23</sup> The perils of homelessness are well known, and they are intensified for asylum seekers who may not speak English or may have already been victimized.<sup>24</sup> Homelessness “is closely connected to declines in physical and mental health; homeless persons experience high rates of health problems such as HIV infection, alcohol and drug abuse, mental illness, tuberculosis, and other conditions.”<sup>25</sup> Asylum seekers can have a difficult time adjusting to homeless shelters due to linguistic and other barriers.<sup>26</sup>

Finally, the Proposed Rule will result in more asylum seekers having to navigate the complex and evolving immigration bureaucracy without legal counsel, because they will not have the means to afford attorneys.<sup>27</sup> Asylum seekers with counsel fare far better than those without counsel. In 2017, 90 percent of those without legal representation were denied asylum in immigration court while only 54 percent of those with legal representation were denied.<sup>28</sup> Unrepresented individuals are more likely to be affected by appeals, delays in their claims, and

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<sup>18</sup> Olivera Batic-Mujanovic et al, *Influence of Unemployment on Mental Health of the Working Age Population*, MATER SOCIOMED, U.S. National Library of Medicine, National Institutes of Health (June 29, 2017), <https://tinyurl.com/ncbiUnemployment>.

<sup>19</sup> Brett Whysel, *3 Vicious Cycles: Links Among Financial, Physical And Mental Health*, FORBES (June 27, 2018), <https://tinyurl.com/WhyselForbes>.

<sup>20</sup> *Id.*

<sup>21</sup> Money and Mental Health Policy Institute, *The Facts*, <https://tinyurl.com/MoneyandMentalHealth>.

<sup>22</sup> Debbie C. Hocking, Psych, Gerard A. Kennedy, PhD, and Suresh Sundram, *Mental Disorders in Asylum Seekers The Role of the Refugee Determination Process and Employment*, THE JOURNAL OF NERVOUS AND MENTAL DISEASE, Vol. 203, No. 1 (Jan. 2015).

<sup>23</sup> Human Rights First, *Callous and Calculated*, *supra* note 5.

<sup>24</sup> National Coalition on Homelessness, *Vulnerable to Hate: A Survey of Bias-Motivated Violence Against People Experiencing Homelessness in 2016-2017* 9 (Dec. 2018), <https://tinyurl.com/HomelessViolence>.

<sup>25</sup> The Centers for Disease Control and Prevention, *Homelessness as a Public Health Law Issue: Selected Resources*, <https://tinyurl.com/CDCPhomelessness>.

<sup>26</sup> Ted Hesson, *Why So Many Asylum Seekers Come to America and Wind Up Homeless*, VICE (May 11, 2016), <https://tinyurl.com/HessonHomelessness>.

<sup>27</sup> Philip Bump, *Most migration to the U.S. costs money. There's a reason asylum doesn't.*, WASH. POST (April 30, 2019) <https://tinyurl.com/BumpWashPost> (describing the challenge and complexity of asylum cases).

<sup>28</sup> *Id.*

more unreliable adjudications.<sup>29</sup> Despite the drastic gap in success rates between the represented and the unrepresented, counsel is not guaranteed in immigration court. *C.J.L.G. v. Barr*, 923 F.3d 622, 629, n. 7 (9th Cir. 2019). Pro bono providers' resources are already stretched thin, and they can take only a limited number of cases.<sup>30</sup> Thus, retaining a private attorney is necessary for many to have a chance at receiving asylum. Without the ability to work, many will be unable to afford counsel and more meritorious cases will be denied.

**b. In light of the Proposed Rule, many asylum seekers will enter into dangerous and exploitative work situations**

In the face of poverty and the negative consequences that flow from it, many asylum seekers will end up working without authorization in the underground economy. The shift to underground work will put asylum seekers in exploitative and dangerous employment situations.

Multiple studies have shown that unauthorized employees are more likely to endure labor abuses, as well as violence.<sup>31</sup> In a landmark study on labor abuses, 84.9 percent of unauthorized immigrant workers reported not being paid time-and-a-half for their overtime hours, and 37.1 percent of unauthorized immigrant workers had been victims of minimum wage violations in the week prior to their being surveyed.<sup>32</sup> By comparison, 24 percent of immigrant workers with work authorization surveyed reported being victims of wage theft.<sup>33</sup> These abuses have been documented in several localities within the States. For example, in Chicago, 38 percent of undocumented workers reported their employers did not pay them minimum wages, and 66.2 percent of undocumented workers reported their employers did not pay them overtime wages.<sup>34</sup> A recent study of low-wage employees working without authorization in San Diego County found that 64 percent of the janitors surveyed had not been paid what they were owed or suffered some other labor violation.<sup>35</sup> Worse yet, nearly one-third said they had been forced to work against their will, and 17 percent of that group said they had experienced some kind of physical threat, including sexual violence, at work.<sup>36</sup> Women without legal authorization face particularly dangerous work-place situations—in a study of 150 female farmworkers in California, 40

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<sup>29</sup> Ingrid V. Eagly & Steven Shafer, *A National Study of Access to Counsel in Immigration Court*, UNIV. OF PENN. LAW REV. Vol. 164, 1, 47-75 (Dec. 2015) available at <https://tinyurl.com/y5j9bd3p>.

<sup>30</sup> Sabrineh Ardalan, *Access to Justice for Asylum Seekers: Developing an Effective Model of Holistic Asylum Representation*, 48 U. MICH. J. L. REFORM 1001, 1016 (2015), available at <https://tinyurl.com/ArdalanUMich>.

<sup>31</sup> Daniel Costa, *California leads the way*, Economic Policy Institute (March 22, 2018) <https://tinyurl.com/CostaEPI>.

<sup>32</sup> *Id.*

<sup>33</sup> Leo Gertner, Fact Sheet: *Billions are lost to wage theft every year—New Jersey must act to protect workers' paychecks and level playing field for employers*, Economic Policy Institute (Mar. 18, 2019) <https://tinyurl.com/y2qeayp7>.

<sup>34</sup> Douglas D. Heckathorn, et al., *Unregulated work in Chicago: The Breakdown of Workplace Protections In the Low-Wage Labor Market*, Center for Urban Economic Development, University of Illinois at Chicago, 33-34 (2010) available at <https://tinyurl.com/y5bqd55k>.

<sup>35</sup> Bernice Yeung, *Under cover of darkness, female janitors face rape and assault*, REVEAL FROM THE CENTER FOR INVESTIGATIVE REPORTING (June 23, 2015) <https://tinyurl.com/YeungReveal>.

<sup>36</sup> *Id.*

percent had suffered sexual harassment.<sup>37</sup> Asylum seekers often arrive after having suffered sexual and physical abuse, and placing them in exploitative working environments will potentially subject them to further trauma.

Moreover, employers in the shadow economy often do not carry workers' compensation insurance, leaving workers to pay for treatment of their workplace injuries out of their own pockets. For example, 41 percent of undocumented workers in Illinois paid the cost of their workplace injuries.<sup>38</sup> Even when employers carry coverage, insurance companies often deny unauthorized workers' claims.<sup>39</sup> In some cases, insurance companies even report unauthorized workers to immigration enforcement or for prosecution under state laws that prevent immigrants from making workers' compensation claims with false social security numbers.<sup>40</sup>

In sum, the consequences of the Proposed Rule are vast. Without the ability to legally work, asylum seekers will be forced into precarious conditions impacting their health, safety, and legal status. To survive, many will work without authorization in exploitative jobs.

## **II. The Proposed Rule Harms the States**

In 2017, the States hosted over 10,000 affirmative asylees grantees, more than 68 percent of the total nationwide.<sup>41</sup> By precluding asylum seekers from legally working for a prolonged period, the States will face a number of harms, including: (1) a decrease in tax revenue and in the spending power of asylum seekers, who are vital to the States' economies; (2) increased health care costs because fewer people will be on employer sponsored health insurance; (3) increased burdens on nonprofits and providers funded by the States; and (4) greater challenges in enforcing the States' laws.

### **a. The Proposed Rule will harm the States' economies**

The States—indeed all states—benefit immensely when asylum seekers and other immigrants reside in their communities. The Proposed Rule would limit the financial boon the States experience from the legal entry of asylum seekers into the workforce, decrease tax revenue, and harm the States' labor force.

To begin, the lost wages that will result from this Proposed Rule will lower the spending power and economic contributions of asylum seekers in the States. Immigrants, including asylum seekers, exercise an enormous amount of purchasing power that contributes to the States' economies. For example, in 2017 in New Jersey, immigrants accounted for over \$60.9 billion in spending power.<sup>42</sup> Likewise, California's immigrant population contributes greatly to its

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<sup>37</sup> Bernice Yeung and Andrés Cediél, *Rape in the Fields*, Center for Latin American Studies at University of California Berkley (Fall 2013), <https://tinyurl.com/y23wgaxm>.

<sup>38</sup> Heckathorn, *supra* note 34 at 18.

<sup>39</sup> Michael Grabell & Howard Berks, *They Got Hurt At Work — Then They Got Deported*, NPR (Aug. 16, 2017), <https://tinyurl.com/GrabellNPR>.

<sup>40</sup> *Id.*

<sup>41</sup> Mossad, *supra* note 1.

<sup>42</sup> New Am. Econ., *Immigrants and the economy in New Jersey*, <https://tinyurl.com/y5n669em>.



economy, exercising more than \$282 billion in spending power that same year.<sup>43</sup> There is similar data for many of the States: In Michigan, immigrants contributed \$6.7 billion in spending power;<sup>44</sup> in Illinois, immigrants contributed \$46.6 billion in spending power;<sup>45</sup> in Hawaii immigrants contributed \$5.8 billion in spending power;<sup>46</sup> in New York, immigrants contributed \$117.8 billion in spending power;<sup>47</sup> in Connecticut, immigrants contributed \$14.5 billion in total spending power;<sup>48</sup> and in the District of Columbia, immigrants contributed \$3.3 billion in spending power.<sup>49</sup> Extended delays in obtaining work permits will doubtless reduce the spending power of asylum seekers. The Department itself references the huge amount of lost wages—estimating an annual loss of approximately \$255,877,138 to \$774,764,960 in wages resulting from over two million lost working days while awaiting work authorization. 84 Fed. Reg. at 47,167. This is money that will not be flowing into the States’ businesses and economies.

Furthermore, the States will lose tax revenue as a result of the Proposed Rule. Asylum seekers whose work authorization is delayed will not be paying payroll taxes from the lawful employment they otherwise would have obtained. The Department recognizes the loss in tax revenue that will result to the Federal Government, but it does not estimate the costs to the States. From the States’ perspective, however, the losses could be substantial. Studies estimate that, while unauthorized workers and residents pay taxes, tax contributions increase when more people can legally work. For example, in New Jersey, it is estimated that undocumented immigrants currently pay around \$587 million in state and local taxes annually, which would increase by over \$73 million per year if they were granted legal status.<sup>50</sup> Undocumented immigrants in California pay nearly \$3.2 billion in state and local taxes each year. If given full legal status, that amount would increase to over \$3.6 billion.<sup>51</sup> In Massachusetts, undocumented immigrants pay an average of \$184.6 million in state and local taxes every year, an amount that would increase to \$240.8 million if they had legal status and work authorization.<sup>52</sup> Similarly, undocumented immigrants in New Mexico would have paid in excess of \$8 million more in taxes in 2017 if they had been granted full legal status.<sup>53</sup> Undocumented immigrants in Hawaii paid an estimated \$32.3 million in state and local taxes in 2014.<sup>54</sup> Their contribution would rise to \$42.8 million if they could receive legal status.<sup>55</sup> Undocumented immigrants residing in New York paid an estimated \$1.1 billion in state and local taxes, which would increase to \$1.3 billion with the availability of work-authorized status.<sup>56</sup> While asylum seekers are not undocumented,

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<sup>43</sup> New Am. Econ., *Immigrants and the economy in California*, <https://tinyurl.com/yxc7gumu>.

<sup>44</sup> New Am. Econ., *Immigrants and the economy in Michigan*, <https://tinyurl.com/y6bj3m4o>.

<sup>45</sup> New Am. Econ., *Immigrants and the economy in Illinois*, <https://tinyurl.com/yy2ykqr8>.

<sup>46</sup> New Am. Econ., *Immigrants and the economy in Hawaii*, <https://tinyurl.com/y2vjamyw>.

<sup>47</sup> New Am. Econ., *Immigrants and the economy in New York*, <https://tinyurl.com/y57fcw2c>.

<sup>48</sup> New Am. Econ., *Immigrants and the economy in Connecticut*, <https://tinyurl.com/y5luhhbk>.

<sup>49</sup> New Am. Econ., *Immigrants and the economy in District of Columbia*, <https://tinyurl.com/y497lu3b>.

<sup>50</sup> Inst. on Taxation and Econ. Policy, *Undocumented Immigrants’ State & Local Tax Contributions* 3 (Mar. 2017), <https://tinyurl.com/ITEP-UndocTaxes>.

<sup>51</sup> *Id.*

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*

<sup>54</sup> *Id.*

<sup>55</sup> *Id.*

<sup>56</sup> *Id.*

these studies demonstrate that tax revenue is increased when immigrants have work authorization.

Moreover, the Proposed Rule will hurt the labor market and key industries in the States. The Department references this potential harm to employers, noting that “if companies cannot find reasonable substitutes, the rule would primarily be a cost to those companies through lost productivity and profits.” 84 Fed. Reg. at 47,167. It further states that private entities “may incur a cost, as they would be losing productivity and potential profits.” 84 Fed. Reg. at 47,168. But the Department presumes that companies will “bear little or no costs” if they “are able to easily find reasonable labor substitutes.” 84 Fed. Reg. at 47,167. Without support, the Department concludes that the potentially affected population is a “very small percentage of the U.S. labor market.” 84 Fed. Reg. at 47,165.

Contrary to these assertions, there are several sectors in the States that disproportionately employ immigrants and are likely to face costs if asylum seekers are unable to work legally. In New Jersey, for example, service providers report that many asylum seekers are employed as home health aides, engineers, dental assistants, construction workers, and in farming and agriculture. Immigrants fill over two-thirds of the jobs in California’s agricultural and related sectors, almost half of those in manufacturing, 43 percent of construction workers, and 41 percent of workers in computer and sciences.<sup>57</sup> Likewise, approximately 43 percent of employed undocumented workers in Illinois are employed in the food services and manufacturing industries.<sup>58</sup> In New York, immigrants account for 71.4 percent of taxi drivers and chauffeurs; 68.3 percent of workers in private households, including maids, housekeepers, and nannies; 57.9 percent of those working as chefs and head cooks; 57.3 percent of nursing, psychiatric, and home health aides; and 44.7 percent of the state’s workers in traveler accommodation.<sup>59</sup> One in 6 Connecticut workers is an immigrant, or 17.6 percent of the population, and immigrants make up more than 20 percent of the workers in the construction, manufacturing, and food service industries.<sup>60</sup> These areas will likely see the greatest reduction in their workforce as they seek “reasonable labor substitutes,” which indeed may not even be available. 84 Fed. Reg. at 47,167.

#### **b. The Proposed Rule will increase the States’ health care costs**

For many asylum seekers, delaying the ability to work will result in delaying essential health care. Employed asylum seekers and their families may rely on employer-sponsored health insurance, but the unemployed will not have this avenue available for health coverage. Asylum seekers are also ineligible for federally-funded Medicaid. *See* 8 U.S.C. § 1641(b). Thus, many

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<sup>57</sup> Am. Immigration Council, *Immigrants in California* 4 (Oct. 4, 2017) <https://tinyurl.com/CAP-Immigrants-in-CA>.

<sup>58</sup> Fred Tsao, *Illinois Undocumented Immigrant Population: a Summary of Recent Research*, Illinois Coalition for Immigrant and Refugee Rights, 11-12 (Feb. 2014) <https://tinyurl.com/y36s9le4>.

<sup>59</sup> New Am. Econ., *The Contributions of New Americans in New York* (New York, NY) 9-10 (Aug. 2016) <https://tinyurl.com/y5z96o5z>.

<sup>60</sup> Am. Immigration Council, *Immigrants in Connecticut* (Oct. 13, 2017) <https://tinyurl.com/y35tkvs5>.

asylum seekers will be without healthcare, which will increase costs to the States and cause a decline in overall public health.<sup>61</sup>

Several of the States offer State-funded healthcare programs that may experience increased need due to the Proposed Rule. For example, California, New York, the District of Columbia, Illinois, Oregon, Massachusetts, and Washington all provide full scope health benefits to low-income children regardless of immigration status.<sup>62</sup> Starting January 2020, California will expand these benefits to those 25 and younger.<sup>63</sup> Connecticut offers state-funded Medicaid coverage to low-income pregnant asylum seekers and asylum seeker children under 18. In Illinois, asylum seekers can access medical coverage and services through state-funded community agencies.<sup>64</sup> The District of Columbia anticipates that some asylum seekers subject to the Proposed Rule, who otherwise would have received employer-sponsored health coverage, will qualify for locally-funded Medicaid or other health care coverage.<sup>65</sup> 29 DCMR 9503.2. Without employment and employer-sponsored health insurance, more asylum seekers and their families will need to utilize programs that are funded solely by the States.

Adult asylum seekers, who in most cases cannot qualify for State-funded health insurance plans, will likely find themselves uninsured as they await work permits. Without insurance, individuals are far more likely to skip the preventative care that keeps them healthy.<sup>66</sup> In the long term, they are more likely to develop more expensive medical conditions that may need to be treated in emergency care settings. These costs may be borne by the States and their public and private institutions, because public hospitals often pay for the care of uninsured patients.<sup>67</sup>

Lack of health insurance also will worsen the general public health of the States' population. For example, the uninsured are less likely to receive vaccinations, which prevent the

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<sup>61</sup> Incidentally, the Trump Administration recently issued a proclamation denying immigrant visas to those without health insurance based on its purported concern that failing to have insurance has a negative fiscal impact. "Presidential Proclamation on the Suspension of the Entry of Immigrants Who Will Financially Burden the United States Healthcare System" (Oct. 4, 2019), *available at* <https://tinyurl.com/y6n3gyf5>. This alleged concern is undermined by the actions, such as this, wherein the Trump Administration makes it even harder for people to access health care.

<sup>62</sup> Nat'l Conf. St. Legis., *Immigrant Eligibility for Health Care Programs in the United States*, (Oct. 19, 2017), <https://tinyurl.com/ycg4tdbu>.

<sup>63</sup> Bobby Allyn, *California is 1<sup>st</sup> State to Offer Health Benefits to Adult Undocumented Immigrants*, NPR (July 10, 2019), <https://tinyurl.com/Allyn-NPR>.

<sup>64</sup> See Ill. Dep't of Hum. Servs., *PM 06-21-00: Medical Benefits for Asylum Applicants and Torture Victims*, <https://tinyurl.com/III-Med>. The list of organizations can be found here: <http://www.dhs.state.il.us/page.aspx?item=117419>.

<sup>65</sup> Department of Healthcare Finance, *D.C. Healthcare Alliance*, <https://tinyurl.com/ybzd9v3>.

<sup>66</sup> Stacey McMorro et al, *Determinants of Receipt of Recommended Preventive Services: Implications for the Affordable Care Act*, AM J PUBLIC HEALTH (Dec 2014), *available at*: <https://tinyurl.com/McMorrowPublicHealth>; Jennifer E. DeVoe et al., *Receipt of Preventive Care Among Adults: Insurance Status and Usual Source of Care*, 93 AM. J. OF PUBLIC HEALTH 5 786-791. (May 1, 2003), *available at*: <https://tinyurl.com/DeVoePublicHealth>.

<sup>67</sup> California Association of Public Hospitals and Health Systems, *About California's Public Health Care Systems*, <https://tinyurl.com/y68c6m87> (Public hospitals in California account for 40 percent of hospital care to the remaining uninsured in the communities they serve).



spread of infectious diseases throughout the community.<sup>68</sup> According to one study, while 44 percent of insured adults received the flu shot, only 14 percent of uninsured adults did.<sup>69</sup> Inoculation helps prevent the spread of the flu, which resulted in some 79,400 deaths nation-wide in 2017-2018.<sup>70</sup> When more people have quality health care, the entire community benefits.

State and locally funded mental health services may also face an increased need, as fewer asylum seekers will have health insurance to cover mental health care. Many localities and states fund mental health providers that assist traumatized asylum seekers. For example, every year, the Highland Human Rights Clinic in Oakland, California (operated by Alameda County) conducts approximately 80 to 120 health assessments of asylees, the vast majority of whom need mental health referrals due to abuse and trauma. New York provides inpatient psychiatric services to youth,<sup>71</sup> and also offers undocumented state residents access to its Community or Crisis Residences regardless of their ability to pay,<sup>72</sup> which may see an increased demand since fewer immigrant families will be able to afford health insurance under the Rule.

**c. The Proposed Rule will increase the burden on the States' nonprofits and service providers**

In order to protect the rights of asylum seeking residents and integrate them into their communities, the States fund nonprofits and service providers that serve this vulnerable population. Under the Proposed Rule, these State-funded efforts will become more difficult and more expensive.

As noted above, see *supra*, Part I. a., legal counsel is a critical factor in whether an asylum claim succeeds or fails. As a result, several of the States fund nonprofits to provide legal assistance in immigration-related matters. For example, New Jersey allocated \$3.1 million in state funds in FY 2020 for legal assistance to individuals in removal proceedings.<sup>73</sup> Similarly, since FY 2015-16, California has allocated \$147 million to non-profit legal service organizations through the Unaccompanied Undocumented Minors and Immigration Services Funding programs.<sup>74</sup> The State of Washington also allocated one million dollars from its general fund for FY 2019 to legal services organizations serving asylum seekers and other migrant populations in the State.<sup>75</sup> Among other programs, New York has allocated \$10 million in its FY 2020 enacted

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<sup>68</sup> Peng-jun Lu et al, *Impact of health insurance status on vaccination coverage among adult populations*, 48 AM J PREV MED. 647–661 (April 15, 2015) available at <https://tinyurl.com/y5es4yt4>.

<sup>69</sup> *Id.*

<sup>70</sup> Centers for Disease Control and Prevention, *Estimated Influenza Illnesses, Medical visits, Hospitalizations, and Deaths in the United States – 2017-2018 Influenza Season*, <https://tinyurl.com/y3tf8ebl>.

<sup>71</sup> See generally Decl. of Donna M. Bradbury at 362-68 (Exhibit 60), *Washington v. Trump*, No. 2:18-cv-00939-MJP (W.D. Wash. July 17, 2018), ECF No. 31.

<sup>72</sup> *Id.*

<sup>73</sup> See N.J. Dep't of Treasury, Office of Mgmt. & Budget, *Appropriations Handbook FY2019-2020*, B-204, <https://tinyurl.com/yxw256og>.

<sup>74</sup> Cal. Dep't of Soc. Serv. (CDSS), *Immigration Services Program Update* 1 (Mar. 2019).

<sup>75</sup> See Wash. Laws of 2018, ch. 299, § 127(65) (amending Laws of 2017, 3d Spec. Sess., ch. 1, § 128) (Mar. 27, 2018) <https://tinyurl.com/yy3rduov>.

budget to fund the Liberty Defense Project, a State-led, public-private legal defense fund designed to ensure that immigrants have access to legal counsel.<sup>76</sup> The District of Columbia allocated \$2.5 million for FY 2020 to programs that provide services and resources to its immigrant population, including asylum seekers.<sup>77</sup> Under Oregon House Bill 5050, passed in 2019, the non-profit Innovation Law Lab will receive \$2 million in state funding for a two-year project for immigration defense.<sup>78</sup> In FY 2018, Connecticut's Judicial Branch provided \$13.8 million through the Connecticut Bar Foundation to nonprofit civil legal service providers in the State, all of which provide legal services to immigrants, including asylum seekers.<sup>79</sup>

Even with this state and local funding, immigration nonprofits have limited resources.<sup>80</sup> If asylum seekers are unable to retain private attorneys because they cannot work, the already scarce resources of these organizations will be stretched even thinner, and additional resources will be necessary. Harms to these organizations redound to their funders, which include the States.

Additionally, several of the States have allocated funds for specialized programs to integrate asylees, which may be strained if applicants cannot work during much of the pendency of their claims. California, for example, provides assistance for some asylees, including cash assistance, food benefits, and funding to certain school districts to improve the well-being, English-language proficiency, and academic performance of their students.<sup>81</sup> The New York Office for New Americans has established neighborhood-based Opportunity Centers throughout the State to provide, among other things, English language courses and business development skills for immigrants.<sup>82</sup> One of Washington State's social service programs partners with local governments, community and technical colleges, ethnic community-based organizations, and other service provider agencies to deliver educational services, job training skills, assistance establishing housing and transportation, language classes, and other comprehensive support services.<sup>83</sup>

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<sup>76</sup> See N.Y. St., Div. of Budget, *Governor Cuomo Announces Highlights of the FY 2019 State Budget* (Mar. 30, 2018) <https://tinyurl.com/y6qv2jev>.

<sup>77</sup> *Mayor Bowser Announces \$2.5 Million Available for FY 2020 Immigrant Justice Legal Services Grant Program*, DC.gov (July 12, 2019) <https://tinyurl.com/DC-Grant>.

<sup>78</sup> H.B. 5050, 80th Or. Legis. Assemb., 2019 Reg. Sess. (Or. 2019) <https://tinyurl.com/Or-HB5050>.

<sup>79</sup> Connecticut Bar Foundation, IRS Form-990 (2018) <https://tinyurl.com/yxaf7avg>.

<sup>80</sup> Daniella Silva, *A scramble to help families left behind: The fallout of the Trump administration's immigration raids*, NBC NEWS (Sept. 12, 2018) <https://tinyurl.com/SilvaRaids> ("As one raid follows another, lawyers and nonprofit leaders say their resources are being stretched increasingly thin[.]")

<sup>81</sup> *Cash Assistance Program for Immigrants (CAPI)*, Cal. Dep't of Soc. Servs., <http://www.cdss.ca.gov/CAPI>; *Trafficking and Crime Victims Assistance Program*, Cal. Dep't of Soc. Servs., <https://www.cdss.ca.gov/inforesources/TCVAP>; *California Newcomer Education and Well-Being*, Cal. Dep't of Soc. Servs., <https://tinyurl.com/yvfv3ogn>.

<sup>82</sup> See N.Y. St. Off. New Ams., *Our Mission*, <https://tinyurl.com/y5wb8dws>; see also N.Y. St. Off. for New Americans, *Request for Applications, RFA #I8-ONA-32*, <https://tinyurl.com/y3oqjul6>; N.Y. St., Pressroom, *Governor Cuomo Announces Expansion of Services for Immigrant Community Through Office for New Americans*, <https://tinyurl.com/y3yd54sb>.

<sup>83</sup> See Office of Refugee & Immigration Assistance, Econ. Servs. Admin., Wash. Dep't of Soc. & Health Servs., *Briefing Book for State Fiscal Year 2018* at 28-29 (Jan. 2019), <https://tinyurl.com/y528prka>.

It will be more difficult for asylum seekers to effectively utilize these programs and integrate if they are not able to work while their cases are pending—a time during which they could be building their skills, practicing English, and learning about their communities. The U.N. High Commissioner of Refugees has explained that: “Employment is also closely related to other areas of integration, such as access to housing, family reunification, language, healthcare, a driver’s license, networks, childcare, and the asylum process itself.”<sup>84</sup>

#### **d. The Proposed Rule hampers the ability of the States to enforce their laws**

The States have a fundamental interest in being able to enforce their own laws. *State of Alaska v. U.S. Dept. of Transp.*, 868 F.2d 441, 443 (D.C. Cir. 1989). When rulemaking impinges on that ability, the States suffer an injury. *New Motor Vehicle Bd. of California v. Orrin W. Fox Co.*, 434 U.S. 1345, 1351 (1977) (Rehnquist, J., in chambers). Here, by forcing asylum seekers into the shadows, the Proposed Rule interferes with the ability of the States to enforce labor and civil rights protections.

Through labor and civil rights laws, the States protect their residents from wage theft, exploitation, and discrimination at work. *See generally*, N.J. Stat. Ann. § 34:11-56a to -56a38; N.J. Stat. Ann. § 10:5-1 *et seq.*; *Serrano v. Underground Utilities Corp.*, 970 A.2d 1054, 1064 (presuming that undocumented aliens may pursue relief under workers’ compensation laws and obtain retrospective compensation under New Jersey prevailing wage laws); Cal. Bus. & Prof. Code § 17200 *et seq.*; Cal. Lab. Code § 200-1200; N.Y. Labor Law Articles 5 (hours of labor), 6 (payment of wages), 19 (minimum wage standards), and 19-A (minimum wage standards for farm workers); N.Y. Workers’ Comp. Law § 17 (McKinney); D.C. Code §§ 32-1301, *et seq.* (Wage Payment and Collection Law); D.C. Code §§ 32-1001, *et seq.* (Minimum Wage Revision Act); D.C. Code §§ 32-531.01, *et seq.* (Sick and Safe Leave Act); D.C. Code §§ 32-1331.01, *et seq.* (Workplace Fraud Act), and D.C. Code §§ 2-220.01, *et seq.* (Living Wage Act). These laws are enforced without respect to immigration status, but their enforcement is premised on employees’ ability and willingness to report violations.

Despite the significant labor and discriminatory abuses that befall unauthorized workers, fear of reprisal and deportation often stops unauthorized workers from reporting such violations.<sup>85</sup> Asylum seekers in particular have reportedly failed to report labor violations—including working weeks without pay and physical abuse at work—because they fear immigration consequences.<sup>86</sup> A study in Chicago found that, of the immigrant workers who suffer a workplace injury and report it to their employer, 23 percent have reported being either immediately fired or threatened with deportation.<sup>87</sup>

This fear of retaliation has been recognized by the courts as a common and problematic occurrence that undermines labor and civil rights protections. In *Rivera v. NIBCO, Inc.*, 364 F.3d 1057, 1065 (9th Cir. 2004), the Ninth Circuit explained that the possibility of retaliatory actions

<sup>84</sup> U.N. High Commissioner of Refugees, *Engaging With Employers In The Hiring Of Refugees* 5 (2018) <https://www.unhcr.org/5adde9904.pdf>

<sup>85</sup> Human Rights Watch, “*At Least Let Them Work*” *supra* note 17; Daniel Costa, *supra* note 31.

<sup>86</sup> Human Rights Watch, “*At Least Let Them Work*” *supra* note 17.

<sup>87</sup> Heckathorn, *supra* note 34, at 18.

results in “most undocumented workers [being] reluctant to report abusive or discriminatory employment practices.” Also illustrative of this problem are the facts that led to the Ninth Circuit’s decision in *Arias v. Raimondo*, 860 F.3d 1185, 1187, 1192 (9th Cir. 2017). In that case, the court found that an employer retaliated against an employee when the employer’s attorney contacted Immigration and Customs Enforcement (ICE) to take the complainant into custody at a scheduled deposition in a labor related case.

If asylum seekers fear reporting because they do not have work authorization, it will make it harder for the States’ agencies to enforce civil rights and labor laws. Indeed, Delaware’s Office of Construction Industry Enforcement anticipates that it will likely face complications in carrying out investigations should workers reduce cooperation based on fear of being caught working without authorization. Furthermore, without work authorization, asylum seekers will not feel comfortable making claims with state agencies, meaning that they may endure exploitative and discriminatory employment practices for a longer time period. Many claims may become stale or fall outside of the statute of limitations before asylum seekers feel secure enough to make them.

Given the high rates of exploitation among asylum seekers, *supra* Part I. b., actions—such as this Proposed Rule—that discourage timely reporting of violations interfere with States’ abilities to enforce their laws and should be avoided.

### **III. The Proposed Rule Violates the Law**

The Proposed Rule violates the APA because it is arbitrary and capricious and does not contain the regulatory analysis required under federal law and executive orders.

#### **a. The Proposed Rule violates the APA because it is arbitrary and capricious**

Under the APA, agencies must engage in “reasoned decision making.” *Motor Vehicle Mfrs. Assn. of U.S., Inc. v. State Farm Mut. Automobile Ins. Co. (State Farm)*, 463 U.S. 29, 52 (1983). When an agency changes longstanding policies, it must “show that there are good reasons for the new policy” and it must provide a “detailed justification” for adopting its proposed policy. *FCC v. Fox Television Stations*, 556 U.S. 502, 515 (2009). Agencies must consider “the advantages and the disadvantages of agency decision” before taking action. *Regents of Univ. of Cal. v. U.S. Dep’t of Homeland Sec.*, 279 F. Supp. 3d 1011, 1046 (N.D. Cal. 2018) (quoting *Michigan v. EPA*, 135 S. Ct. 2699, 2707 (2015)). If an agency fails to meet these requirements, the action can be set aside as arbitrary and capricious. *See Fox*, 556 U.S. at 537. The Department failed to engage in reasoned decision making in this case, and thus, the Proposed Rule is arbitrary and capricious.

At the outset, the Department did not adequately consider any of the harms to asylum seekers that are raised above, such as the impact on mental and physical health. The harms to the States, their labor and civil rights enforcement regimes, and their economies, likewise were not assessed or considered.



Moreover, the Department did not provide a reasoned justification for the Proposed Rule, particularly given that it is a significant policy change. All of the Department's justifications are either unsupported or undermined by the facts. First, the Department justifies the Proposed Rule, in part, by a purported concern with fraudulent applications or individuals filing asylum claims simply to obtain work permits. *See e.g.*, 84 Fed. Reg. at 47,150 n.3, 47,160. But the current regulatory and statutory framework, which includes the 150 day waiting period and 30 day deadline, was adopted to weed out meritless claims for asylum. Prior to 1994, asylum applicants could apply for work authorization along with their asylum applications. *Rules and Procedures for Adjudication of Applications for Asylum or Withholding of Deportation and for Employment Authorization*, 59 Fed. Reg. 14,779, 14,780 (Mar. 30, 1994). Concerned with people applying for asylum solely to obtain a work permit, in 1994, the INS proposed the 150 day waiting period, and with that the current 30 day deadline. *Id.* In so doing, the INS stated that 150 days was a "period beyond which it would not be appropriate to deny work authorization to a person whose claim has not been adjudicated" and that such waiting will "reduce the incidence of asylum applications filed primarily to obtain employment authorization." *Id.* The INS adopted the 30 day deadline and ultimately concluded that most asylum claims should be adjudicated within 60 days and "all applicants could have work authorization after 180 days" unless their asylum claims were denied. *Rules and Procedures for Adjudication of Applications for Asylum or Withholding of Deportation and for Employment Authorization*, 59 Fed. Reg. 62,284, 62,290 (Dec. 5, 1994). In 1997, Congress implemented the statutory 180 day waiting period before work authorization can be granted in asylum cases. 8 U.S.C. § 1158(d)(2). Even after this change, the INS maintained the 30 day deadline, because it recognized the importance of ensuring that bona fide asylees are able to obtain work authorization as quickly as possible. *Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures*, 62 Fed. Reg. 10,312, 10,317-18 (Mar. 6, 1997). The Department fails to provide a sufficient explanation as to why the INS's rationale in adopting the current regulatory scheme is no longer applicable.

In addition, the Department attempts to justify the regulatory change by claiming that the 30 day deadline does not give it sufficient time to vet applications because of a recent increase in applications. 84 Fed. Reg. at 47,155. According to the Department, it "would be contrary to USCIS's core missions and undermine the integrity of the documents issued if USCIS were to reduce or eliminate vetting procedures solely to meet a 30-day deadline established decades ago." This argument is unpersuasive, as there is no evidence that the Department needs to eliminate or reduce vetting to comply with the deadline. For example, in 2018, there were *more* asylum related EAD applications than there are now—yet, the Department processed over 80 percent of applications within 30 days and did not eliminate or reduce any vetting measures. *Rosario v. USCIS*, 2:15-cv-00813, (W.D. Wash.), ECF No. 146-1 (Aug. 6, 2019). There is no evidence that, even with high asylum application numbers, the 30 day deadline results in increased grants of fraudulent applications.

The Department further contends that the Proposed Rule is necessary because an increase in asylum receipts has made processing asylum-related EADs within 30 days unsustainable. According to USCIS, it has redistributed its adjudication resources to work up to full compliance, and without the deadline it could shift resources to other applications. This reasoning fails for several reasons. First, the Department has presented neither evidence

demonstrating an urgent need to shift resources to other applications, nor evidence of how an extended processing time will assist in this regard, particularly given that the resources will need to be reallocated back to adjudicating the EAD applications at some point. Second, while agency data indicates that there has been a substantial increase in asylum-related EAD applications since 2014, the number of EAD applications dropped by 9 percent between 2017 and 2018,<sup>88</sup> and this number is on track to drop even further in 2019. *Rosario v. USCIS*, 2:15-cv-00813 (W.D. Wash.), ECF No. 146-1 (Aug 6, 2019) (demonstrating that USCIS has received 53,809 fewer EAD applications in 2019 than at the same point in 2018).

The Department also justifies the Proposed Rule by stating that it is necessary to be consistent with a 2017 EAD regulation that eliminated the 90 day adjudication deadline for those in work-related visa and immigration categories. 84 Fed. Reg. at 47,149. The referenced regulation was promulgated as part of a broader regulatory change for work-related immigrant and nonimmigrant visas. *Retention of EB-1, EB-2, and EB-3 Immigrant Workers and Program Improvements Affecting High-Skilled Nonimmigrant Workers Final Rule*, 82 Fed. Reg. 82,398, 82,457 (2017 AC21 Rule) (“the 2017 EAD regulation”). The Department’s justification is not well reasoned because the 2017 EAD regulation can be easily distinguished from the Proposed Rule. The 2017 EAD regulation focused only on employment-related immigration, and did not address humanitarian-based immigration applications. The two regulations thus impact entirely different populations, and as such, raise entirely different human welfare concerns. Furthermore, the impact that the agency anticipated for the 2017 EAD regulation was far less than the impact that the agency now anticipates for the Proposed Rule. When implementing the 2017 regulation, the Department believed that delayed EAD adjudications would “be rare and mitigated by the automatic extension provision for renewal applications, which will allow the movement of resources in such situations.” 81 Fed. Reg. 82,407. Here, however, the Department itself anticipates that EAD adjudications will be delayed across the board, estimating that 120,000 applicants per year will wait longer than 30 days. 84 Fed. Reg. at 47,165.

Finally, the Department does not adequately justify why it cannot implement an alternative deadline, such as a 60 or 90 day deadline, if the 30 day deadline is eliminated (although the States do not concede, without seeing any such proposal, that such a change would survive arbitrary and capricious review). The Department provides a cursory explanation for refusing to implement any alternative, stating that setting a deadline “would not provide USCIS with the certainty and flexibility it needs to fulfill its core mission.” 84 Fed. Reg. at 47,167. This statement contradicts the Department’s other statements in the record. For example, the economic impact statement estimates the cost of the Proposed Rule under the assumption that work permits will be adjudicated within 60 or 90 days. If the Department cannot affirm that EADs will be processed within any set time frame, then the Department’s own estimates of the costs are incorrect. On the other hand, if these estimates are correct, then it is unclear why the Department cannot adopt the deadlines it used to calculate them. Notably, the economic impact statement does not calculate the costs of implementing an alternative deadline to demonstrate that the Department has chosen the least burdensome alternative. 84 Fed. Reg. at 47,157.

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<sup>88</sup> U.S. Citizenship and Immigration Services Ombudsman, Annual Report 2019, 72, <https://tinyurl.com/DHSombudsman>.

**b. The Proposed Rule does not contain an adequate analysis of federalism concerns or the proposal's fiscal impact**

There are several requirements that agencies must comply with to ensure that economic and fiscal harm is considered when promulgating a rule—particularly when that harm will be inflicted upon the States. Under Executive Order 13,132, for policies that have “substantial direct effects on the States,” agencies must consult with State and local officials “early in the process of developing the proposed regulation” and conduct a federalism summary impact statement before issuing a proposed rule. Exec. Order No. 13,132, 64 Fed. Reg. 43,255, 43,257 (Aug. 10, 1999). The Unfunded Mandates Reform Act also requires agencies to prepare a written statement, including a cost benefit analysis, for proposed and final rules with “Federal mandates” that may result in expenditures by State, local or tribal governments, in the aggregate, or the private sector, of \$100 million or more in any one year. Pub. L. 104-4 § 205 (1995). For such rules, the agency must identify and consider a reasonable number of regulatory alternatives and adopt the most cost effective and least burdensome alternative. *Id.* Executive Order 12,866 requires agencies to assess “all costs and benefits” of a proposed regulation and available alternatives. Exec. Order No. 12,866, 58 Fed. Reg. 51735 (1993). If the agency determines that regulation is required it should “select . . . approaches that maximize net benefits.” Exec. Order No. 13,563, 76 Fed. Reg. 3821 (Jan. 21, 2011). The Department failed to comply with each of these requirements.

First, the Department failed to conduct an adequate federalism analysis under Executive Order 13,132. As described *supra* Part II, the Proposed Rule will result in additional costs to the States’ programs and a substantial loss in revenue. Yet, the Department did not analyze any of these harms, summarily stating that the Proposed Rule “does not have sufficient federalism implications to warrant the preparation of a federalism summary impact statement.” 84 Fed. Reg. at 47,160, 47,169. Further, despite the States’ clear interests in their revenue, the Department did not consult with the States. Tellingly, this conflicts with prior practice by the INS in enacting work permit related regulations. When the INS proposed a regulation regarding the implementation of an employment verification system, even though the regulation did not require the states to adopt the system, the agency still sought the input of States. *See e.g.*, 52 Fed. Reg. 16,216, 16,218 (May 1, 1987). The Department’s failure to analyze the impact on the States and consult with them violates Executive Order 13,132.

Additionally, despite the expenses and costs that the Proposed Rule will have on both the States and the private sector, the Department did not provide the analysis required under the Unfunded Mandates Reform Act. Indeed, there is no indication that the Department fully considered reasonable alternatives to the Proposed Rule, and that this is the most cost effective option—particularly in light of the substantial losses in tax revenue and economic contributions that will stem from it.

Finally, in violation of Executive Order 12,866, the Department did not assess *all* of the costs associated with the Proposed Rule or provide an analysis of the available alternatives. While the Department recognizes that the Proposed Rule will result in hundreds of millions of dollars in lost wages, the Department fails to address the impact that this loss would have on State and local economies. Further, the Department cursorily suggests that the States may face

“possible loss of tax revenue.” 84 Fed. Reg. at 47,160. But, loss in revenue to the States will occur, and there is no accounting for it in the Department’s analysis of the costs and benefits.

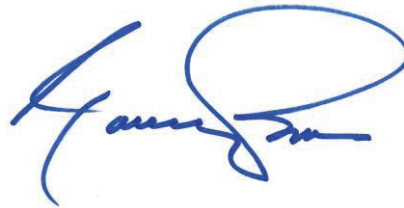
#### IV. Conclusion

The Proposed Rule will have devastating impacts on asylum seekers and their families, interfere with the States’ administration of laws, and shift costs onto the States. In addition to these harms—the Proposed Rule will violate the law if it is implemented. For these reasons, we urge the Department to withdraw the Proposed Rule.

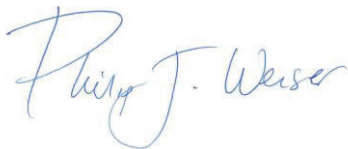
Sincerely,

A blue ink signature of Gurbir S. Grewal, featuring a stylized 'G' and 'S'.

GURBIR S. GREWAL  
New Jersey Attorney General

A blue ink signature of Xavier Becerra, written in a cursive style.

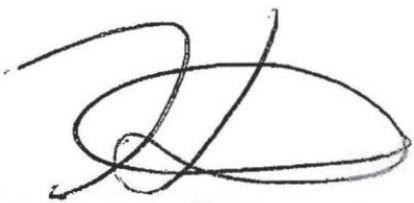
XAVIER BECERRA  
California Attorney General

A blue ink signature of Phil Weiser, written in a cursive style.

PHIL WEISER  
Colorado Attorney General

A blue ink signature of William Tong, written in a cursive style.

WILLIAM TONG  
Connecticut Attorney General

A black ink signature of Karl A. Racine, written in a cursive style.

KARL A. RACINE  
District of Columbia Attorney General

A black ink signature of Kathleen Jennings, written in a cursive style.

KATHLEEN JENNINGS  
Delaware Attorney General



A handwritten signature in black ink, appearing to read "Clare E. Connors", with a long horizontal flourish extending to the right.

CLARE E. CONNORS  
Hawaii Attorney General

A handwritten signature in black ink, appearing to read "Kwame Raoul", with a large, stylized "K" and a long horizontal flourish.

KWAME RAOUL  
Illinois Attorney General

A handwritten signature in black ink, appearing to read "Tom Miller", in a cursive style.

TOM MILLER  
Iowa Attorney General

A handwritten signature in blue ink, appearing to read "Maura T. Healy", with a large, stylized "M" and a long horizontal flourish.

MAURA T. HEALY  
Massachusetts Attorney General

A handwritten signature in blue ink, appearing to read "Dana Nessel", in a cursive style.

DANA NESSEL  
Michigan Attorney General

A handwritten signature in blue ink, appearing to read "Keith Ellison", in a cursive style.

KEITH ELLISON  
Minnesota Attorney General

A handwritten signature in blue ink, appearing to read "Aaron D. Ford", in a cursive style.

AARON D. FORD  
Nevada Attorney General

A handwritten signature in blue ink, appearing to read "Hector Balderas", in a cursive style.

HECTOR BALDERAS  
New Mexico Attorney General

A handwritten signature in blue ink, appearing to read "Letitia James", in a cursive style.

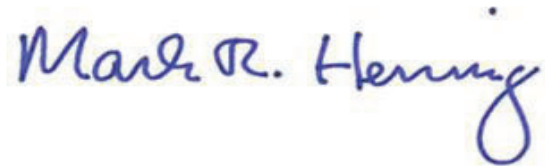
LETITIA JAMES  
New York Attorney General

A handwritten signature in blue ink, appearing to read "Ellen F. Rosenblum", in a cursive style.

ELLEN F. ROSENBLUM  
Oregon Attorney General

A handwritten signature in blue ink, appearing to read "TJDJ".

THOMAS J. DONOVAN, JR.  
Vermont Attorney General

A handwritten signature in blue ink, appearing to read "Mark R. Herring".

MARK R. HERRING  
Virginia Attorney General

A handwritten signature in blue ink, appearing to read "Bob Ferguson".

BOB FERGUSON  
Washington State Attorney General

# FOOTNOTE 5

## Callous and Calculated: Longer Work Authorization Bar Endangers Lives of Asylum Seekers and Their Families

U.S. immigration [law](#) and [regulations](#) provide asylum seekers with work authorization documents, which allow them to accept employment after their asylum applications have been pending for at least 180 days. The Trump Administration is currently [considering](#) doubling this already lengthy wait period for a work permit to one year. The inability to work for at least six months after requesting asylum already leaves many asylum seekers, who are often traumatized and vulnerable, in precarious situations—homeless, unable to feed themselves and their children, and struggling to get health care. Increasing that wait period could have devastating consequences.

Those asylum seekers without means to survive must rely on friends, family, or local communities for support. But some refugees lack support networks and suffer abuse and [exploitation](#) as undocumented workers in the labor market while waiting for work authorization. Many become homeless, live in overcrowded or unsafe conditions, and lack basic needs like food and clothing. Without work authorization, asylum seekers cannot [purchase](#) health insurance under the Affordable Care Act or obtain a social security number, and often cannot apply for a state-issued identification card or driver's license, which further limits access to transportation, banking, and private-support services. Lack of income also hinders opportunities to find and retain competent legal counsel.

Refugees and their families already suffer severely while waiting for work authorization, as these examples from Human Rights First's pro bono refugee representation project illustrate:

- **Maria\*, a transgender woman who fled persecution in Honduras, is struggling to support herself while she waits for work authorization.** A cousin took her in after she was released from detention to await her asylum hearing, but he harassed and tried to control her. Recently, he kicked Maria out, forcing her to move from one friend's home to another to find a place to sleep. She is in dire need of work authorization to support basic needs and pay for health care because she does not qualify for insurance. Maria has already missed several important medical appointments because she could not pay for transportation.
- **Michele\*, a torture survivor who sought asylum from the Central African Republic, had no way to support himself until he received work authorization.** He was homeless and sleeping on subways or a spare bed in an emergency room when it was not at capacity. After struggling to survive for six months, Michele found a job with a car service and can feed and house himself after receiving a work permit. He has since been granted asylum.
- **Francis\*, a gay man who fled his native Jamaica, could not support himself without work authorization.** He spent weeks without a permanent place to live, moving from home to home sleeping on the couches of acquaintances who could not afford to financially support him. Now with work authorization, he has a commercial driver's license, is gainfully employed and living in his own apartment. Francis is working with his attorneys to prepare for his asylum hearing later in 2019.
- **Sarai\* fled domestic violence and death threats from a notoriously violent Salvadoran gang. She was forced to live with an abusive man in the United States because she lacked work authorization.** Unable to support herself and with no relatives to turn to when she arrived in the United States, Sarai and her son

moved in with a man who abused and threatened her. After receiving work authorization, Sarai found work as a shop clerk and was able to rent a room in a house for herself and her son. After being granted asylum by an immigration judge, Sarai was reunited in the United States with her two older children who she was forced to leave behind in El Salvador, and the family now lives together in their own home.

- **Hassan\* suffered brutal political persecution in Sudan before fleeing to seek asylum in the United States, where he ended up homeless without work authorization.** For a short time, he was able to stay with a friend but ended up in a homeless shelter and struggling to access healthy food. He was frightened in the shelter and terrified about how he was going to survive. After getting work authorization, he was able to find a job driving sick patients to their medical appointments and now has a stable place to live. His asylum application is currently pending in the asylum office backlog.
- **Katherine\* is a single mother from Honduras who survived significant domestic violence and sought asylum in the United States. She and her children initially stayed with relatives, but they were cruel to Katherine and her children – denying them food and pouring water on their beds so they had nowhere to sleep.** To protect her children Katherine decided the family had to leave, and they ended up in a homeless shelter because she could not work. Once Katherine received work authorization, she completed a home health aide certificate program and found a stable job. Katherine was later granted asylum by an immigration judge. The family is now out of the shelter system and has their own apartment.
- **Lorraine\* fled Nigeria to protect herself and her daughter from gender-based violence. Although she qualified as a nursing aide in the United States, Lorraine could not work without employment authorization.** She struggled to feed her children and cover medical costs. The family was forced to sleep at a church shelter. Lorraine's mental health suffered as a result of the hardships she endured while struggling to support her family without work authorization in the United States, and she was diagnosed with depression. Recently, Lorraine was granted asylum and is finally beginning to rebuild her life.
- **Andrea\*, who escaped years of severe violence by a domestic partner in Guatemala, could not support her family without work authorization.** When she first reached the United States, she and her children did not have a secure place to sleep and regularly went hungry. After she received employment authorization, Andrea was able to participate in a home health aide training course. She is now gainfully employed as a certified aide, has stable housing, and can care for her family, while she waits for her asylum hearing in immigration court.

Federal [law](#) does not provide any asylum seeker-specific support, such as income, housing or food assistance. Asylum seekers are considered “[non-qualified](#)” immigrants for purposes of federal public assistance and therefore are generally [ineligible](#) for federal assistance, except in the context of emergency humanitarian circumstances or disaster relief. Federal law permits states to provide state-funded benefits to “nonqualified” immigrants, such as asylum seekers. Only about [half](#) of the states have extended any programs, but eligibility for even these limited benefits is often further restricted to children, the elderly, or asylum seekers with specific health conditions.

**Forcing asylum seekers to wait even longer for work authorization would further risk the health, safety, and very lives of the refugees requesting protection in the United States.**

\*Pseudonyms

# FOOTNOTE 10

## Here's Why A Record Number Of Families Are Actually Showing Up At The Border

The Trump administration's hardline immigration policies have done little to stop thousands of Central American families from journeying to the US.



**Adolfo Flores**  
BuzzFeed News Reporter

Posted on May 8, 2019, at 11:43 p.m. ET



*Mario Tama / Getty Images*

The Trump administration on Wednesday announced that a record number of people had been apprehended at the southern border in April, topping 100,000 for the second month in a row and reigniting

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the administration's calls to toughen the nation's response to border crossings, even though its hawkish efforts have done little to stem the flow.

New figures released by Customs and Border Protection showed 109,144 people apprehended along the southern border in April, the highest monthly figure since 2007, though still well below the peak of 1.6 million encountered in 2000. The number includes asylum-seekers who present themselves at official border crossings to ask for refuge.

Officials said the number of families showing up at the border to request asylum has overwhelmed facilities, which were built to house single adults from Mexico, not parents with kids. Border Patrol agents detained more than 58,474 immigrant families along the US–Mexico border in April, the highest monthly number since CBP started tracking the figure in 2012.

US officials have said that, because of the lack of space in processing centers and the limited number of Border Patrol agents, more than 33,000 families with no criminal history have been released.





In order to deal with the influx, immigration officials have erected two new tent camps in El Paso and Donna, Texas, to house thousands of immigrants arrested at the border. Border Patrol Chief Carla Provost said Wednesday that shifting additional resources or building more facilities to detain families will not be enough.

“It's like holding a bucket under a faucet; it doesn't matter how many buckets you give me if we can't turn off the flow,” Provost told the Senate Judiciary Committee.

The surge at the border is being fueled by rampant poverty, violence, corruption, and climate change — all reasons cited by people as they make the perilous journey, usually from Central America, to the US. But the Trump administration's hardline policies and rhetoric, which have turned immigration into one of its biggest battlefields, have also played a role in encouraging more people to migrate now.

Though experts cautioned against calling the administration's policies toward asylum-seekers the biggest factor in the migration surge, violence and corruption in Central America, as well as smugglers capitalizing on fears, have convinced many already in precarious circumstances that now is the time to go.

Andrew Selee, president of the Migration Policy Institute, said the administration's quick-fix policies rather than a consistent approach to the asylum system have likely made the situation at the border worse.

The administration has separated families, forced asylum-seekers to wait in Mexico while their immigration cases proceed in the US, and barred people from asking for refuge if they crossed between ports of entry, among others. Most of the policies enacted have been blocked by US courts.

"Implementing every one of those policies and stopping teaches people where the weaknesses in the systems are, and smugglers exploit the situation," Selee told BuzzFeed News. "But the administration's actions are only part of the story. People would not leave if they didn't have a good reason, if there wasn't already a push factor."



*John Moore / Getty Images*

The vast majority of families are coming from the so-called Northern Triangle countries: Guatemala, Honduras, and El Salvador. The US State Department recently said it was cutting aid to the three countries after President Donald Trump accused their leaders of not doing enough to stop migration flows. But critics say that will only make matters worse.

Trump has also blamed Mexico for not doing enough to stop immigrants from reaching the US, at one point threatening to close the southern border if Mexico didn't stop "ALL illegal immigration."

On the campaign trail, Mexico's new president, Andrés Manuel López

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Obrador, promised a more humane approach toward immigrants and said he would not “do the dirty work of foreign governments” in stopping Central American migrants. In January his administration gave humanitarian visas, which allow migrants to live and work in Mexico, to more than 13,000 Central Americans who arrived in the southern state of Chiapas.

Weeks later, under pressure from the US, Mexico stopped issuing the visas to large groups of people. The new administration has since shown signs of continuing to detain and deport immigrants much like its predecessors.

Mexico's immigration-enforcement agency apprehended at least 43,475 people from the start of the year to April 22, a 10% decrease from the 44,062 apprehensions during the same period in 2018 under the previous administration. In April, Mexican authorities carried out raids on two caravans in Chiapas, resulting in the detention of 250 and 371 people.

A Central American immigrant moving toward the United States in hopes of a better life grabs the bars of the Mexico–US border fence.

*Pedro Pardo / AFP / Getty Images*

Endemic violence and crime continue to be a driving force for Central Americans leaving their homes. According to a report from Doctors Without Borders, the violence experienced in the region was not unlike that seen by people living through war.

“Citizens are murdered with impunity, kidnappings and extortion are daily occurrences,” the report said. “Non-state actors perpetuate insecurity and forcibly recruit individuals into their ranks, and use sexual violence as a tool of intimidation and control.”

Honduras had a homicide rate of 40 per 100,000 people in 2017, while Guatemala saw 22.4 per 100,000 inhabitants, according to Insight Crime, among the highest in the Western Hemisphere. By comparison, a study of crime and murder in 30 of the largest US cities found that in 2017, Baltimore had a homicide rate of 55.8 per 100,000 people.

Climate change has also played a growing role in driving migration from Central America. The United Nations said last year that lower-than-average rainfall and drier conditions have resulted in significant crop losses in the Northern Triangle, leaving farmers and families with not enough food to eat or sell.

In August, Honduras declared an emergency in the Dry Corridor, a tropical dry forest strip vulnerable to climate change that stretches from southern Mexico to Panama, where it's estimated that 82% of maize and bean crops were lost.

Edwin Castellanos, dean of the Research Institute at Guatemala's Valle University and an expert on climate change in Central America, said a warming climate has exacerbated poverty in the region. A recent report that Castellanos coauthored found that subsistence farmers, who harvest mostly to feed themselves, and indigenous people are the

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most affected by unpredictable rainfall and rising temperatures.

“Climate change models indicate that rain will continue to decrease, so we can expect the situation to only get worse,” Castellanos told BuzzFeed News. “If we don't implement risk systems and save water for farmers, there will be more instability and they will have more reasons to migrate.”

The plight of families living in these conditions was highlighted after the death of 16-year-old Juan de León Gutiérrez, who died in US custody after crossing the border without his parents. The teen's mother told CNN that Gutiérrez, who was living on one meal a day because of failed harvests, hoped to help his siblings suffering from hunger and drought.

*Spencer Platt / Getty Images*

Large groups of people making the journey from Central America, known as caravans, have forced smugglers to be more creative and aggressive, Selee of the Migration Policy Institute said. Central Americans following news coverage of the caravans have viewed the

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groups as a safer way to make the journey north without having to pay thousands of dollars to a smuggler.

In response, smugglers have begun to offer bus rides transporting people from their home countries to the US–Mexico border in days. Acutely aware of US immigration law, smugglers have also told would-be migrants that the Trump administration won't be able to detain them for long if they cross the border with a child, Selee said.

"Smugglers pitch people on the information they have: 'Hey, why don't you bring your kids? I'll charge you two for one because as you know, they can't hold families,'" Selee said. "People know some of the information, and they might not act on it absent smuggling, but it gives smugglers ammunition."

Stephanie Leutert, director of the Mexico Security Initiative at the University of Texas at Austin, said smugglers are charging families with children less than individuals attempting to get into the US undetected.

"If you're a single adult, you have a whole extra leg on the end from, say, the border to Houston," Leutert told BuzzFeed News. "Which you don't have if you have a kid."

A man who works as a transportation assistant for smugglers recently told Leutert that a trip with a child costs \$5,000 for a family of three. But an adult who wants to cross the border without being apprehended can pay \$7,000 to \$9,000 just for themselves.

The sales pitch from smugglers, combined with Trump's statements and policies, has helped drive the migration surge, Leutert said.

"But to say, 'Hey, look, this is all because of Trump' is a stretch," Leutert said.

*John Moore / Getty Images*

The immigration-court backlog in the US has soared to more than 800,000 cases, according to the Transactional Records Access Clearinghouse at Syracuse University, with average times extending nearly two years.

Adam Isacson, director for defense oversight at the Washington Office on Latin America, said smugglers are telling people in Central America that the time to leave is now, before the Trump administration tries again to make it more difficult to get into the US.

"If we were still with Obama and nobody was threatening that the migrant apocalypse was about to come ... smugglers couldn't use that as a sales pitch," Isacson told BuzzFeed News. "It's very easy if you're trying to get the sale to say, 'Go now before the next crackdown.'"

Smugglers also use shorter detention times — a maximum of 20 days for families — as part of their pitch, but it's still a mixed bag. As in any market, you get what you pay for, Isacson said. A cheap smuggler greatly increases your chances of being abandoned in the desert of

being delivered to kidnappers.

"But if you're paying [for] the 'deluxe' or 'gold' package, which a lot of these folks are, they make it all the way," Isacson said. "I'm sure it's still not the most comfortable trek for these families. Some of the ones who pay less are still packed into the back of a cargo truck, which sounds absolutely miserable."

*John Moore / Getty Images*

The last 30 years of immigration flows have created a lot of transnational families, relatives who live in different states across the United States but maintain ties, said Pablo Alvarado, executive director of the Los Angeles-based National Day Laborer Organizing Network.

It's human nature to want to be with your loved ones, Alvarado said. And many of these families are choosing to follow relatives in the United States as opposed to fleeing to other parts of Latin America, where they have limited family networks and fewer job prospects.

"I don't know any family who has told me that El Salvador is the best

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place for them to reunite and to have a future," Alvarado told BuzzFeed News. "People are going to go where they feel safe, where they can raise a family in a safe environment, where they feel their kids will not be attacked or recruited for criminal activity."

Separating kids from their parents under the Trump administration's "zero tolerance" policy didn't work as a deterrence, Alvarado said, suggesting that the threats people are facing in Central America are much bigger than the risk of being separated.

"If they feel that staying is more dangerous than leaving, then they're going to leave," Alvarado said. "If they feel the traveling is safer than staying in their neighborhood, parents will make that choice, not for themselves but for their children."

Meanwhile, the Trump administration has tried to make it more difficult for victims of domestic violence to receive asylum, a reason some women traveling with children say they're fleeing their countries. A report from 2014 found that in Honduras, domestic violence was among the most commonly reported crimes nationwide but rarely resulted in a conviction.

The Migration Policy Institute found that El Salvador, Guatemala, and Honduras had some of the highest rates of gender-motivated killings of women in the world. Less than 3% of these murders were resolved by the courts.

Despite the Trump administration's efforts, a federal judge struck down the policy blocking asylum-seekers who experienced domestic abuse from passing a credible-fear finding from immigration officers, a crucial first step in the asylum process.

"When you have no justice, what do you expect people are going to do? They're going to leave," Alvarado said. "All of those things weigh more than a Trump message of deterrence."

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# CORRECTION

May 9, 2019, at 12:09 p.m.

Baltimore had a homicide rate of 55.8 per 100,000 people in 2017. An earlier version of this post referred to an estimate for 2018.

## TOPICS IN THIS ARTICLE

Immigration



Adolfo Flores is a reporter for BuzzFeed News and is based in Los Angeles.

Contact Adolfo Flores at [adolfo.flores@buzzfeed.com](mailto:adolfo.flores@buzzfeed.com).

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# FOOTNOTE 13



## UPDATING THE ESTIMATE OF REFUGEES RESETTLED IN THE UNITED STATES

### WHO HAVE SUFFERED TORTURE

Craig Higson-Smith<sup>1</sup>

*Center for Victims of Torture*

Torture is a strong predictor of a broad range of debilitating and lasting physical and mental health conditions (Quiroga & Jaranson, 2005). Populations of refugees who are being resettled in the United States include many torture survivors, many of whom require significant and specialized health and mental health care. For example, refugees who report experiences of torture are four times more likely to suffer from post-traumatic stress disorder (PTSD) than other refugees, and 2.5 times more likely to suffer from depression (Steel et al., 2009). For these reasons, it is essential that policy makers in the field of refugee health services have a reliable estimate of the number of torture surviving refugees in the country.

Until recently, policy makers have been forced to rely on an outdated estimate of between 400,000 and 500,000 torture surviving refugees in the United States. This number was derived in the early 1990s from the oft-cited torture prevalence rate of 5-35% found extensively in the literature on torture. This range is in fact based on studies conducted in several different high income countries in which refugees were being resettled; it is not known how accurately those studies reflect the situation in the United States. The estimate appears in a chapter in a volume intended to provide a critical account of current refugee policies in European countries (Baker, 1992).

Given that this number has not been updated in more than twenty years, and that significant numbers of refugees have been resettled in the United States every year during that period, the estimate of 400,000 to 500,000 torture surviving refugees in the United States is certainly incorrect. The actual number must be much greater than that. How much greater is the key question to which policy-makers require an answer.

Unfortunately, measuring the prevalence of something as sensitive and complex as experiences of torture in populations as diverse as refugees in the United States is an extremely challenging task. Were it easier, there is no doubt that the estimate would have been updated regularly. Nevertheless, given the importance of this question for policy on refugee resettlement and the provision of health and other services, the *Center for Victims of Torture* (CVT) found it essential to see what could be done to update the understanding of the size of the population of torture surviving refugees in the United States. To do this, CVT's researchers developed the following meta-analytic methodology and arrived at the results and conclusions laid out towards the end of this summary paper.

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<sup>1</sup> Craig Higson-Smith is the Director of Research for the *Center for Victims of Torture*. Early stages of this research were conducted by Dr. Patrick Tschida, Research Associate.



## METHODOLOGY

The Preferred Reporting Items for Systematic Reviews & Meta-Analyses (PRISMA) guidelines (Liberti, 2009) were followed for the systematic literature review and meta-analysis carried out herein. A comprehensive literature search was conducted utilizing four online library search databases (Embase, Ovid Medline, PILOTS/WOS, and PsychInfo), with assistance from a Diehl Hall Bio-Med Librarian on the University of Minnesota Health Sciences campus. ‘Exploded’ MeSH headings were additionally utilized for a wider range of nested terms so that the resulting list of citations would include most or all major epidemiologic study designs. “Torture,” “survivor,” “refugee and/or asylum-seeker” and “prevalence” were the four main categories of terms used.

**Table 1: List of search terms**

Abuse*	Refugee*
Aggress*	Asylum*
Battered*	Asylee*
Human rights abuse*	Refugee (MeSH)
Maltreat*	Prevalence
Mistreat*	Risk
Neglect	Risks
Persecut*	Rate
Tortur*	Rates
Trauma*	Logistic regression*
Violen*	Epidemiolog*
Battered women (MeSH)	Epidemiologic Methods (MeSH)
Child abuse (MeSH)	Epidemiologic Measurements (MeSH)
Crime victims (MeSH)	Epidemiologic factors (MeSH)
Human rights abuses (MeSH)	“statistics as topic” (MeSH)
Violence (MeSH)	
“Wounds and Injuries” (MeSH)	

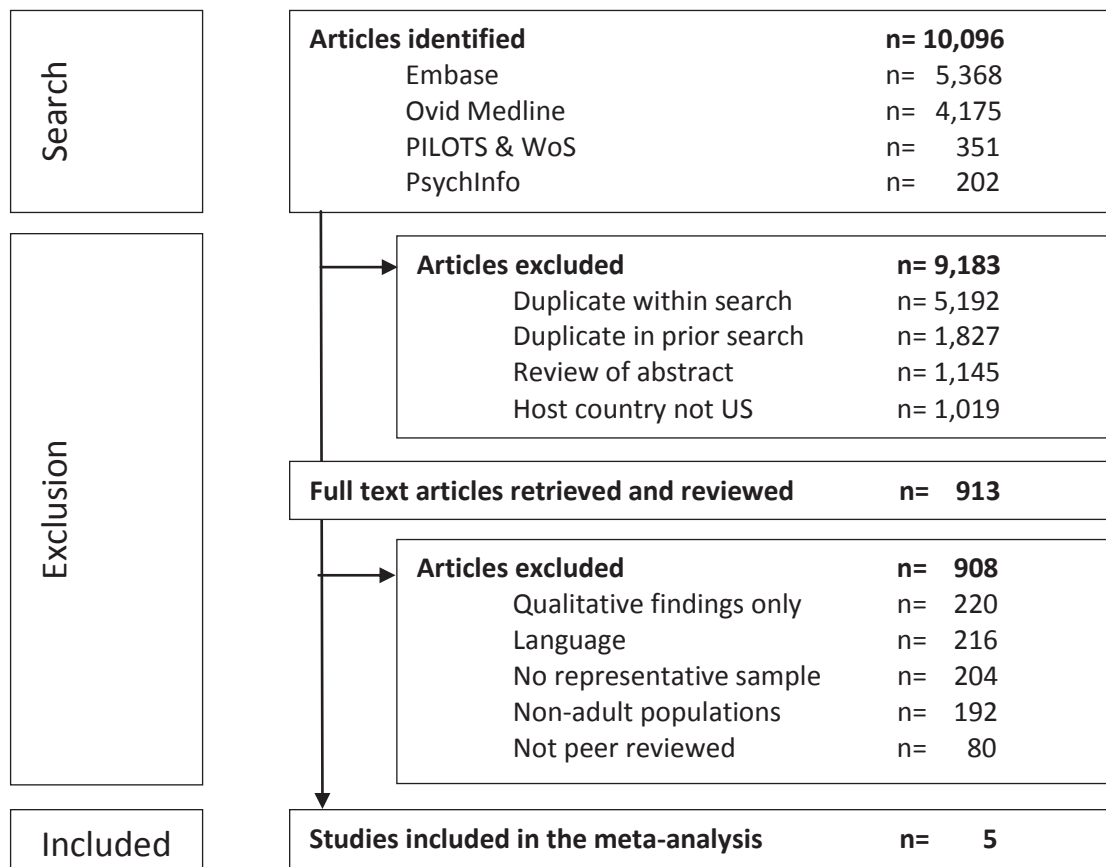
As intended to ensure comprehensiveness, this initial search produced a very long list of potentially relevant references. These references were then reviewed at two levels (abstract review and full text review) with respect to the following inclusion criteria:

1. The published article had been through a peer-review process.
2. The results of the study were published in the years 1980 to 2015.
3. The results included a quantitative estimate of the prevalence of torture within an adult population (defined as eighteen years or older) of asylum seekers, asylees, or refugees currently within the United States. Although some included studies differentiated between primary and secondary torture survivors, this was not an inclusion criterion.



4. The study reported on a representative sample of the general population, as opposed to convenience or help-seeking samples.

The process by which the initial search results were narrowed down to the final set of five studies is summarized in Figure 1.



**Fig. 1 Search, retrieval and exclusion process**

Following this initial search, CVT released preliminary findings to the member centers of the *National Consortium of Torture Treatment Programs (NCTTP)* of the United States. Currently the consortium has 34 members in 17 states. Consortium members were asked to identify any other studies that might have been missed in CVT's initial search. Although several members of the consortium responded positively to this initiative, emphasizing the importance of more accurately estimating the number of torture surviving refugees in the United States, no further studies or publications were identified. Representatives of one center raised concerns about the findings of one study included in the meta-analysis – further details are included below.

#### *Studies included in the analysis*



Keller et al. (2003), associated with the *Bellevue/NYU Program for Survivors of Torture*, conducted interviews with 70 asylum seekers who were being detained in New York, New Jersey and Pennsylvania. The people interviewed were mostly men and from various countries on the African continent. 74% reported experiences of torture.

Jaranson et al. (2004), associated with the *University of Minnesota* and the *Center for Victims of Torture (CVT)*, interviewed 1,134 Oromo and Somali refugees living in the Minneapolis/St. Paul area. 55% of Oromo respondents and 36% of Somali respondents reported experiences of torture. Overall, 44% of the sample reported being tortured.

Marshall et al. (2005), associated with the *Program for Torture Victims, Los Angeles*, conducted a household survey and interviewed 490 refugees from Cambodia who were living in California at the time of the study. 24% of those interviewed reported being primary victims of torture, and a further 31% were secondary victims. In total, 54% of respondents had been exposed to torture. In this study, torture was identified based on responses to item 16 of the Harvard Trauma Questionnaire – Part One (Mollica et al., 1992). A representative of the *Program for Torture Victims, Los Angeles* raised concern that the actual torture prevalence of torture among refugees from Cambodia may be in fact much higher than the reported 54%. This position was later supported by Dr. Megan Berthold, one of the authors of the original paper. Given that exclusion of this paper from the meta-analysis would in fact reduce the overall result (as opposed to increasing it, in line with the higher estimate suggested), the author decided to retain the paper so as to arrive at a more accurate estimate of the number of torture surviving refugees in the country.

Willard et al. (2013), associated with the *Community Health Alliance*, conducted retrospective chart reviews of public health screenings of Iraqi refugees arriving in Utah. Of 497 files reviewed, 24% reported being primary survivors of torture, and 31% reported being secondary survivors. In total, 56% of the samples reported exposure to torture.

Shannon et al. (2014), associated with the *University of Minnesota* and *CVT*, reviewed the charts following public health screening of 179 Karen refugees from Burma and Thailand, now living in Minneapolis and St. Paul, Minnesota. Of these, 27% reported being primary survivors of torture and 51% reported being secondary survivors.

### *Meta-Analysis*

The simple meta-analysis was conducted using MetaXL Version 2.2. In essence, this analysis provides a weighted average of a number of study results. Prevalence rates for primary victims of torture were used in the analysis, although some studies also estimated the prevalence of secondary victims. The author used a random effects model which assumes that variability in effects arise from two sources: sampling error and study level differences. In other words, this analysis acknowledges that prevalence



rates will differ depending upon refugees' country of origin, the period when they entered the United States, and the methodology employed to estimate the prevalence of torture.

## RESULTS AND DISCUSSION

The analysis suggests an overall population prevalence of 0.44 (95% confidence interval: 0.3-0.58). Since recent estimates suggest that there are three million refugees, asylees and asylum seekers in the United States (Bureau of Population, Refugees and Migration, 2015), this analysis suggests that there may be as many as 1.3 million torture surviving refugees in the country. This number is more than three times higher than the statistic often referred to in policy documents.

Meta-analyses are entirely dependent upon the methodologies and results of the studies included in the analysis. As a result, there are a number of qualifications that should be borne in mind when interpreting these results.

Firstly, this analysis is based on only five studies. Given the enormous variability in the histories and experiences of refugee populations from different parts of the world, this is a very small number indeed. Although CVT researchers have conducted an extensive and systematic search for relevant studies, it is possible that one or more studies have been missed, especially any studies not published in the peer-reviewed, scientific literature. Certainly more studies would enhance the accuracy of this kind of analysis.

Secondly, several studies included in this meta-analysis have relatively small sample sizes for population level research. Such small sample sizes reduce the confidence in prevalence estimates within particular populations, and although sample size is accounted for in the meta-analysis model, it is difficult to make more accurate predictions based on a few small samples.

Thirdly, an analysis of this kind attempts to provide a prevalence estimate across an extremely heterogeneous population of refugees, asylum seekers and asylees. The complexity of the population demands many more studies before researchers are able to narrow down the confidence intervals around any estimate of the prevalence of torture.

Finally, because experiences of torture are so difficult to talk about, the manner in which researchers assess a history of torture will greatly influence their results. Studies included in this analysis used a variety of methods. With more studies, it might be possible to ascertain the impact of different methodologies on prevalence estimates.

## CONCLUSIONS

Given all these limitations on the data (and in fact in the field itself), it is very difficult to arrive at a specific and defensible estimate of the number of torture surviving refugees in the United States. The





result quoted in the results section above is merely the mid-point of a broad range within which the true prevalence rate very likely lies.

However, it is clear that the actual number of tortured refugees is a great deal higher than the statistics currently in use among policy makers. Even if we were to abandon the estimate of up to half a million—which is clearly out of date—this research suggests that the prevalence rate is higher than the often quoted rate of between 5 and 35%. This is likely the result of the United States' focus in the selection of people for resettlement within the country. This pattern continues with current political debates on how many Syrian refugees should be accepted into the United States, and the suggestion that preference should be given to refugees with medical problems and/or a history of torture.

The United States is a generous recipient of refugees from around the world. With this generosity comes an obligation to do what is possible to provide medical and mental health care to these highly traumatized populations. A history of torture is highly predictive of severe and lasting physical and mental health concerns. As such, the prevalence of torture in refugee populations is an essential parameter for the long-term planning and sustainability of services for the refugee population. CVT recommends that policy makers and researchers develop methodologies to more accurately track the growing number of torture surviving refugees living in the United States.



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# FOOTNOTE 14



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## The mental health needs of asylum seekers and refugees – challenges and solutions

[Piyal Sen](#)

Consultant Forensic Psychiatrist, Complex Needs Service, St Andrew's, Essex, UK; Visiting Lecturer, Department of Forensic and Neurodevelopmental Sciences, Institute of Psychiatry, Psychology and Neuroscience, King's College London, UK, email [psen@standrew.co.uk](mailto:psen@standrew.co.uk)

Corresponding author.

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### Abstract

Global events like wars and natural disasters have led to the refugee population reaching numbers not seen since the Second World War. Attitudes to asylum have hardened, with the potential to compromise the mental health needs of asylum seekers and refugees. The challenges in providing mental healthcare for asylum seekers and refugees include working with the uncertainties of immigration status and cultural differences. Ways to meet the challenges include cultural competency training, availability of interpreters and cultural brokers as well as appropriately adapting modes of therapy. Service delivery should support adjustment to life in a foreign country. Never has the need been greater for psychiatrists to play a leadership role in the area.

### Definitions

A refugee is defined by the United Nations as:

*A person who owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it.*  
(United Nations Convention Relating to the Status of Refugees, 1951, amended by the 1967 Protocol)

Asylum seekers are defined as people who have applied for asylum under the 1951 Refugee Convention on the ground that if they are returned to their country of origin they have a well-founded fear of persecution on account of race, religion, nationality, membership of a particular social group or political opinion. They remain asylum seekers for so long as their application or appeal against refusal of their application is pending. Asylum seekers should be distinguished from economic migrants, who choose to

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enter another country for paid employment.

## Challenges

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Because of global events like wars and natural disasters, but also because of increased freedom of travel, which is exploited by people-trafficking networks, the number of refugees has reached levels not seen in western Europe since the Second World War. According to figures from the end of 2014, there were nearly 20 million refugees throughout the world, and that number is now likely to be even greater (United Nations, [2016](#)).

At least 80% of all refugees are from low- and middle-income countries and half are children. There are great challenges in meeting their needs, because of the protracted nature of modern warfare, an increasingly dangerous climate for humanitarian workers and erosion of the concept of legitimate asylum. There are reported to be increasingly negative public attitudes in some high-income countries towards immigrants, including refugees and asylum seekers.

Asylum seekers are at particular risk of developing mental illness, including post-traumatic stress disorder (PTSD), depression and anxiety (Fazel *et al*, [2005](#)). That risk is enhanced by their immigration status, time in detention, unemployment, absence of family support and complex asylum processes (Bhugra *et al*, [2014](#)). Their needs pose significant challenges for mental health services.

What are the challenges in providing mental healthcare for this group? One of the greatest challenges for asylum seekers is coping with the uncertain nature of their immigration status and, in particular, the difficulties negotiating the process of seeking asylum. If their asylum application is refused, that could lead to destitution, and there is the associated threat of detention (Robjant *et al*, [2009](#)).

A major challenge for mental health workers is understanding how different cultural groups communicate psychological distress. Lack of knowledge could lead to some patients receiving inappropriate psychiatric diagnoses, and normal human responses to extremely traumatic life events could be inappropriately pathologised. On the other hand, there is a risk of missing clinically significant disorders caused by trauma; psychological distress is commonly manifested in terms of somatic complaints in some cultures. Mental health workers need to understand that ‘talking therapies’ that have been developed in high-income countries are primarily ego-based and require detached introspection. Such introspection could be alien to a socio-centric individual, who might respond better to a treatment that is focused on functional recovery (‘What do you need to do?’) than an emotion-focused approach (‘How are you feeling?’) (Summerfield, [2001](#)).

## Solutions

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The use of interpreters is important, as language difficulties are a significant barrier to effective consultation, and cultural brokers or cultural consultants could foster trust and help to improve understanding of the individual’s life situation. The therapeutic team should be in a position to offer information about mental health resources, local refugee community organisations, and how to access legal support as well as information on employment, education and housing. It might be desirable for areas with large numbers of asylum seekers to develop a specialist team or specialists within a team.

Training in cultural awareness and cultural competency should be mandatory for all health professionals, to give them a set of academic and interpersonal skills that will allow them to manage diverse populations and to understand cultural differences and similarities. Types of psychotherapy that have an evidence base for their effectiveness in the management of at-risk populations include narrative exposure therapy (NET) and cognitive–behavioural therapy (CBT) (Patel *et al*, [2014](#)). The model of therapy should be sufficiently flexible to incorporate patients’ own belief systems and those of their

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families or carers.

An individual's response to pharmacotherapy will also vary, depending on biological factors. Some ethnic groups could respond to psychotropic medication in ways that are not predictable, depending on variables such as gender, enzymatic (genetic) and dietary differences. Attitudes towards medication and the potential for the patient's parallel use of complementary medication must also be borne in mind when prescribing for at-risk immigrants (Bhugra *et al*, [2014](#)).

Maintaining close links with general medical services is crucial. The model of service delivery for refugees and asylum seekers will depend on the country in which it is offered. In low-income countries, where there is little access to specialist services, the focus should be more on building capacity (Patel *et al*, [2006](#)), along with training of professional staff and consultation with voluntary organisations. In high-income countries, though there could be a hostile political climate, the same issues apply, although there is the additional need to adapt the usual model of service (Vostanis, [2014](#)).

Better tools are needed to estimate the prevalence of mental disorders as well as to assess the needs of local refugee populations. Specialised models of service delivery are being developed for prevention and early intervention; community-based approaches should be focused on increasing knowledge and awareness of mental health issues as well as supporting the process of adjusting to life in the host country (Nazzari *et al*, [2014](#)). Children are at particular risk of receiving suboptimal mental healthcare for difficulties arising from pre-migration and post-migration stress, in part because of the impact of resettlement on their parents' ability to provide care. Service utilisation rates are low, and that could reflect the tendency of the host country's services to attribute their problems to social rather than psychological causes, as well as the family's lack of understanding, or distrust of mental health services (Colucci *et al*, [2014](#)). Child and adolescent mental health services should introduce evidence-based programmes to support them.

Forensic professionals encounter asylum seekers or refugees when they commit a crime. If there are associated mental health problems, the person could be transferred to a secure unit. If patients have committed a crime they may be liable to automatic deportation under UK law, or patients may have exhausted appeal rights for an asylum claim. Their psychiatrist should make appropriate after-care arrangements before discharge, bearing in mind that there could be a threat of deportation to a country where psychiatric care is limited. Forensic services also come into contact with asylum seekers while offering in-reach services to prisons, where the proportion of foreign nationals is growing (currently about 13%). They represent a particularly vulnerable section of the prison population, yet have low levels of contact with mental health services (Sen *et al*, [2014](#)).

There is an urgent need for forensic psychiatrists to be involved in a proper mental health needs assessment of foreign nationals in prison, as well as those held in detention centres, to plan better services to meet their need. The prospect of indefinite detention and inadequate care could contribute to a deterioration of their mental health.

## Conclusion

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In the debate about refugees and asylum seekers, a drive towards inclusive globalisation is in conflict with a drive to restore the identity of the nation state, and exclusivity. Sigmund Freud was aware of these tensions nearly a century ago, and described them in *Civilization and Its Discontents* (1929). As mental health professionals, our task should be to understand and work with these tensions. Never has the need been greater for psychiatrists to play a leadership role in such a politically contentious and emotionally charged area.

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# FOOTNOTE 15





## Immigration Court's Active Backlog Surpasses One Million

The Immigration Court's active backlog of cases just passed the million case mark. The latest case-by-case court records through the end of August 2019 show the court's active case backlog was 1,007,155. If the additional 322,535 cases <sup>[1]</sup> which the court says are pending but have not been placed on the active caseload rolls are added, then the backlog now tops 1.3 million.

During the first eleven months of FY 2019, court records reveal **a total of 384,977 new cases** reached the court. If the pace of filings continues through the final month of this fiscal year, FY 2019 will also mark a new filing record.

While much in the news, new cases where individuals have been required to "Remain in Mexico" during their court processing currently make up just under 10 percent (9.9%) of these new filings. These MPP cases comprise an even smaller share - only 3.3 percent - of the court's active backlog.

As of the end of August, a total of 38,291 MPP cases had reached the court<sup>[2]</sup>, of which 33,564 were still pending. MPP filings by month are shown below in Figure 1.

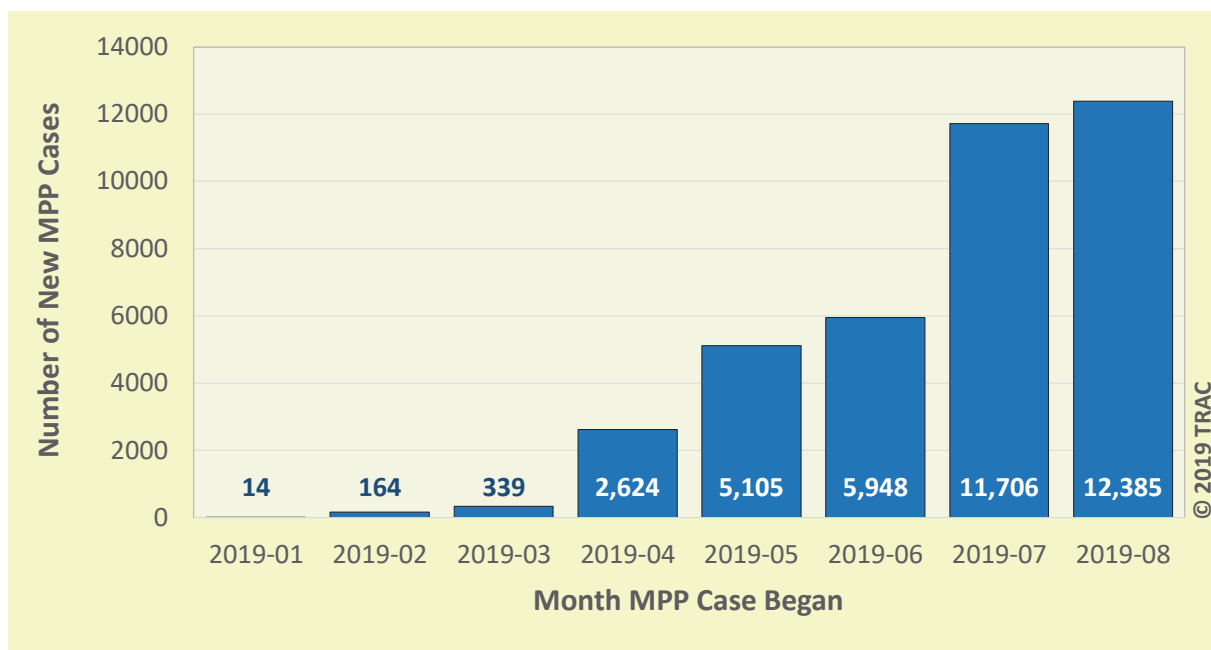


Figure 1. Growth in "Remain in Mexico" Immigration Court Cases  
([Click for larger image](#))

Readers can drill into countless additional details covering all [4.5 million court filings](#) since FY 2001, [the recent MPP component of these filings](#) and [the court's over 1 million active case backlog](#) in online web tools accompanying this brief report.



### Footnotes

<sup>[1]</sup> *This EOIR number is as of the end of June 2019 and includes some pending BIA cases. These cases were previously administratively closed, but were ordered reopened by former Attorney General Sessions.*

<sup>[2]</sup> *The Executive Office for Immigration Review (EOIR) [compiled counts that were recently provided to the Marshall Project](#). These counts appear to be unreliable. According to personal conversations with the author of that report, the EOIR statistics he had received from EOIR indicated that just under 17,000 MPP cases had been filed as of the end of August. However, EOIR's actual case-by-case records indicate that in fact 38,291 MPP cases had reached the court as of the end of August.*

AR004226

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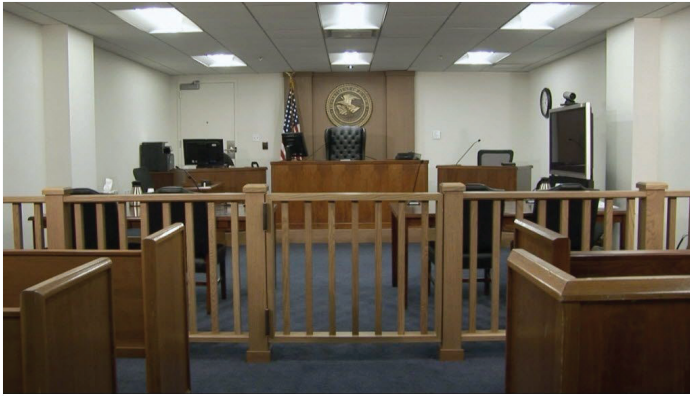
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A federal immigration courtroom in Arlington. The immigration court backlog has nearly doubled in the Trump years, and attorneys worry that due process will suffer for both detained immigrants and those free but fighting deportation.



By [Dianne Solis](#)  
5:21 AM on Sep 28, 2019

In Fort Worth, a judge in a black robe sits in a small courtroom with nowhere for the public to watch the proceedings.

Thirty miles to the east in a Dallas courtroom, a government attorney sits before a judge's empty bench.

At a federal lockup hundreds of miles away in Big Spring, detainees in prison garb line up in front of a camera.

In all three places, their images are beamed back-and-forth to one another so that asylum seekers and other immigrants can learn their fate on big flat-screen TVs. This is immigration court, where some attorneys and judges say a rapid expansion in the use of video conferencing — including in

[what](#) matters.

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# FOOTNOTE 16



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